

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1369779-1

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SERIALIZED *ml* FILED *ml*

MAY 1965

FBI - ALBANY

*Slm*

Universal File Case Number 161A-HQ-1042752-1A<sup>1</sup>Field Office Acquiring Evidence MM

Serial # of Originating Document \_\_\_\_\_

Date Received 1/3/93

From \_\_\_\_\_

(Contributor)

(Contributor) b6

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(State)

By \_\_\_\_\_

(Name of Special Agent)

To Be Returned ☐ Yes ☒ NoReceipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

Ronald H. Brown  
SpinReference: MM Report dated 1/4/93

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

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Universal File Case Number 161A-NQ-1042752-A<sup>2</sup>

Field Office Acquiring Evidence \_\_\_\_\_

Serial # of Originating Document \_\_\_\_\_

Date Received 1/3/93

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By \_\_\_\_\_

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To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

*Ronald N Brown*  
*Spec*

Reference: \_\_\_\_\_

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

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(Title)

Ronald H. Brown

(File No.)

161A-HQ-1042752 \*

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161A-HQ-1042752-1A-1

Universal File Case Number \_\_\_\_\_

Field Office Acquiring Evidence \_\_\_\_\_

Serial # of Originating Document \_\_\_\_\_

Date Received 12/31/92

From \_\_\_\_\_

(Name of Contributor)

(Address of Contributor)

By SA

To Be Returned ☐ Yes ☒ NoReceipt Given ☐ Yes ☒ NoGrand Jury Material - Disseminate Only Pursuant  
to Rule 6 (e), Federal Rules of Criminal Procedure☐ Yes ☒ No

Title:

Ronald H Brown

Spin; Buded 1/4 WF

Reference: \_\_\_\_\_

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Universal File Case Number \_\_\_\_\_

Field Office Acquiring Evidence \_\_\_\_\_

Serial # of Originating Document \_\_\_\_\_

Date Received 12/31/92

From \_\_\_\_\_

(Name of Contributor)

(Address of Contributor)

By SA

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To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant  
to Rule 6 (e), Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

Ronald H Brown

Spin; Busted 1/4 WF

Reference: \_\_\_\_\_

(Communication Enclosing Material)

Description: ☒ Original notes re interview of

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Universal File Case Number 161A-HQ-1042752-1A-3

Field Office Acquiring Evidence WMFO

Serial # of Originating Document \_\_\_\_\_

Date Received 1/4/93

From \_\_\_\_\_  
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\_\_\_\_\_  
(City and State)

By SA  \_\_\_\_\_  
(Name of Special Agent) b6  
b7c

To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

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Universal File Case Number 161A-HQ-1042752-1A-4

Field Office Acquiring Evidence WMFO

Serial # of Originating Document \_\_\_\_\_

Date Received 1/4/93

From \_\_\_\_\_  
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(Address of Contributor)

\_\_\_\_\_  
(City and State)

By SA  \_\_\_\_\_  
(Name of Special Agent)

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To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

\_\_\_\_\_

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## FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE WMFO	OFFICE OF ORIGIN BUREAU	DATE 1/11/93	INVESTIGATIVE PERIOD 12/30/92 - 1/4/93
TITLE OF CASE RONALD HARMON BROWN ①		REPORT MADE BY PSS [REDACTED]	TYPED BY: glc
		CHARACTER OF CASE SPIN A	

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**REFERENCE:** Bureau airtel dated 12/23/92; Bureau r/s dated 12/28/92, 12/29/92, and 12/30/92; and WMFO teletypes to SAC, Boston, et al, dated 12/30/92; to SAC, Denver dated 12/31/92; to SAC, Detroit, et al, dated 12/31/92; and to SAC, Cincinnati, et al, dated 1/2/93.

- RUC -

**ADMINISTRATIVE:** All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality, both limited and unlimited, have been granted to the following individual: WMFO T-1 is identified as [REDACTED]

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The results of WMFO General and Electronic indices were negative regarding the appointee and other relevant individuals.

APPROVED <i>[Signature]</i>	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW	
COPIES MADE: 2 - BUREAU (161A-HQ-1042752) ATTN: PSS [REDACTED] 1 - WMFO (161A-HQ-1042752)		161A-HQ-1042752-2	
ENCLOSURE			
DISSEMINATION RECORD OF ATTACHED REPORT		Notations	
Agency		<i>[Signature]</i>	
Request Recd.			
Date Fwd.			
How Fwd.			
By			

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UNITED STATES DEPARTMENT OF JUSTICE  
Federal Bureau of Investigation

Copy to:

Report of: PSS [REDACTED]  
Date: JANUARY 5, 1993  
Field Office File #: 161A-HQ-1042752  
Title: RONALD HARMON BROWN

Office: WMFO

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Bureau File #: 161A-HQ-1042752

Character: SPIN A

Synopsis: Appointee interviewed and reinterviewed regarding allegations of cronyism and impropriety. Current employments at Patton, Boggs, and Blow and Democratic National Committee verified and professional associates interviewed regarding above allegations. Former employments on Capitol Hill verified. Residence verified. Birth verified. Department of Justice Registry of Foreign Agents and Public Integrity Section; DC Bar, DC Contract Selection Committee; DC Contract Appeals Board; EPA; FCC; FEC; FDIC; FRS; Comptroller of the Currency; House and Senate Lobbyist Registration; SEC; and SDO checked. U.S. Attorney's Office checked and records are attached. Law enforcement agency and U.S. Secret Service checks revealed either no record or no pertinent information concerning the appointee.

- RUC -

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription

12/30/92

RONALD HARMON BROWN, (Hereafter referred to as appointee) Chairman, Democratic National Committee (DNC), 430 South Capitol Street, Southeast, Washington, D.C., was advised of the official identity of the interviewing Agents and the purpose of the interview, that being to ensure that complete, accurate, and current information is available and obtained concerning the appointee to assist the FBI in conducting a thorough background investigation of the appointee for the position with the Federal Government for which the appointee is being considered. Also present during the interview was [REDACTED]

[REDACTED] The appointee voluntarily provided the following information:

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Each of the appointee's answers to the questions on the SF-86 and supplement thereto, which was completed by the appointee and dated December 19, 1992, was reviewed with the appointee to ensure its accuracy and completeness. The appointee advised that the written responses to each of the questions on the SF-86 which he had completed were accurate and correct to the best of his knowledge and recollection. The appointee advised that with respect to his employment at the law firm of PATTON, BOGGS, and BLOW, 2550 M Street, Northwest, Washington, D.C., the following employees were familiar with the appointee and have worked with him in the past:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

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BROWN advised that the following individuals were professional associates of his at the DNC:

1. [REDACTED] at the DNC and currently employed at the Presidential Inaugural Headquarters.

Investigation on 12/28/92 at Washington, D.C. File # WMFO 161A-HQ-1042752

by

SA  
SA

Date dictated

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3.  
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The appointee advised that the dates of his prior employment at the Office of Senator EDWARD KENNEDY (January, 1981 - July, 1981) and his prior employment at the U.S. Senate Committee on the Judiciary (August, 1980 - January, 1981) were correct to the best of his knowledge, give or take 30 days.

The appointee advised that with respect to his military service, he served in the U.S. Army from February, 1963, until his discharge in June, 1967. The appointee further advised his assignments in the military were as follows:

February, 1963 - May, 1963, Fort Eustis, Virginia; May or June, 1963 - May, 1966, Kassel Subpost U.S. Military Base, West Germany; May, 1966 - May, 1967, or June, 1967, 38th Replacement Battalion, South Korea.

The appointee advised that he had never used, sold, or purchased, any illegal drugs, including marijuana. The appointee also advised that he had never abused prescription drugs or alcohol.

The appointee advised that he has never been in any type of civil matter as a plaintiff or defendant.

The appointee advised that he has never been involved in any criminal matter as a subject or suspect, nor has he ever been arrested for, charged with, or convicted of any criminal offense.

The appointee advised that he has never been denied employment, dismissed from any employment, or left any employment under unfavorable circumstances or been denied a security clearance by any agency within the Federal Government.

The appointee further advised that he could not recall if his background had ever been previously investigated or if he had ever received a security clearance in the past.

The appointee advised that he has had extensive travel outside the boundaries of the United States and that to the best

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of his knowledge his foreign travel is accurately reflected on the SF-86.

The appointee advised he has never received any type of psychological or psychiatric treatment or counseling.

The appointee has never been the subject of any professional complaints or non-judicial disciplinary action.

The appointee has never been involved in any business or investment circumstances that could involve or have involved conflict of interest allegations.

The appointee advised that he has never had any financial problems which resulted in, but were not limited to, property being repossessed, debts placed for collection, filing for bankruptcy, nor has he been the subject of a tax lien or legal judgement rendered concerning a debt or had any delinquent student loans.

With respect to question 1S of the supplement to the SF-86, the appointee provided the following pertinent information:

1. First International Communications Corporation, 2555 M Street, Northwest, Suite 302, Washington, D.C.

The appointee advised that he is a fifty percent stock holder and director of the company. The appointee further advised that [redacted] in the company is [redacted], Telephone Number [redacted]. The appointee further advised that [redacted] is presently on travel outside of the United States and the date of her return to Washington, D.C., was unknown to the appointee.

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2. Harmon International, Incorporated, 2550 M Street, Northwest, Washington, D.C., Telephone Number 202-457-6000.

The appointee advised that he owns 100 percent of the stock for HARMON International, Incorporated. The appointee further advised that the stock is not issued. The appointee stated that HARMON International, Incorporated, specializes in consultant work and leasing. Specifically, the company leases television equipment to Channel 50. According to the appointee,

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Continuation of FD-302 of RONALD HARMON BROWN, On 12/28/92, Page 4

the company has been in existence approximately six to seven years and the company is dormant most of the time. The appointee advised that through HARMON International, Incorporated, he buys television special effects equipment and television cameras and leases them to Channel 50. The company has no employees and the appointee handles this work himself. The appointee further advised that he primarily deals with [redacted] at [redacted] (Corridor Broadcasting, address unknown).

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The appointee stated that his secretary at the law firm of PATTON, BOGGS, and BLOW, [redacted] could verify the existence of HARMON International, Incorporated. Furthermore, [redacted] the appointee's CPA at COOPERS and LYBRAND, Washington, D.C., handles the accounting work for the company.

3. Chemfix Technologies, Incorporated, (street address unknown), Metairie, Louisiana.

The appointee advised that he served on the Board of Directors for Chemfix from approximately 1984 until January, 1992. The appointee stated that Chemfix Technologies, Incorporated, is a sludge treatment company. The appointee advised that he currently owns over 16 thousand shares of stock in Chemfix and that he formerly owned an additional 16 thousand shares of stock in the company's pension plan. The appointee advised that Chemfix is a public company.

The appointee advised that [redacted] is the [redacted] of Chemfix and can be reached at (Work) telephone [redacted]

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The appointee advised that he initially met [redacted] through [redacted]. The appointee further advised that he does not represent Chemfix or [redacted] but that [redacted] asked him several years ago to invest in Chemfix Technologies.

4. [redacted]  
[redacted]  
[redacted]

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The appointee advised that he owns approximately ten to fifteen percent of [redacted]. The appointee serves on the Board of Directors. According to the

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appointee, [ ] is a small family owned operation which installs and maintains public telephones.

The appointee advised that the company is primarily run by [ ] Work Telephone Number [ ] The appointee advised that [ ] is an old friend with whom he has been acquainted for approximately [ ] years.

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The appointee advised that his primary role in [ ] is an investor.

5. Capital PEBSCO, Incorporated, 666 11th Street, Suite 525, Northwest, Washington, D.C.

The appointee advised that he is the President of Capital PEBSCO, Incorporated. The appointee further advised that Capital PEBSCO performs record keeping and marketing services for the District of Columbia Government pension plan. The appointee explained that the company PEBSCO administers the Public Employee Deferred Compensation Plan, which is a self-funded pension plan.

The appointee stated that Capital PEBSCO is run by [ ]  
The appointee stated that [ ] could be reached at Work Telephone Number [ ]

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The appointee stated that he owns 100 percent of the stock (unissued) of Capital PEBSCO.

6. WKYS Radio Station, 4300 Nebraska Avenue, Northwest, Washington, D.C., Telephone Number 202-686-9300.

The appointee advised that he owns about ten percent of WKYS and that he is on the Board of Directors. The appointee stated that [ ] principal stock holder for WKYS. [ ] serves as [ ] of WKYS and [ ] also is on the Board of Directors.

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7. Boston Bank of Commerce, Boston, Massachusetts.

The appointee advised that he is an investor and owns approximately 16 and 2/3 percent of the stock of the Boston Bank

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of Commerce. The appointee also serves on the Board of Directors for the bank.

The appointee advised that [redacted] the bank and can be reached at [redacted].

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The appointee advised that [redacted] invited the appointee to become an investor of the bank and that is how the appointee became affiliated with Boston Bank of Commerce. The appointee pointed out that the bank is a community bank which is minority owned.

8. National Environmental Controls, Metairie, Louisiana.

The appointee advised that the National Environmental Controls (NEC) is a predecessor to Chemfix Technologies, Incorporated. The appointee advised that he served on the Board of Directors at NEC from approximately 1982 until 1985 or 1986. The appointee advised that the company started as a trash hauling business and eventually evolved into Chemfix Technologies, which is a waste disposal company. The appointee advised that he owns a nominal amount of stock in NEC [redacted]

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The appointee advised that in response to question 15 on the supplement to the SF-86 he has the following clients at the law firm PATTON, BOGGS, and BLOW:

1. VCR Companies Coalition

The appointee advised that several years ago when Japan was exporting VCR's into the United States, the movie industry resisted because they felt it would cause financial ruin. In response to the movie industries resistance, twenty-five American subsidiaries of Japanese electronics firms formed a coalition to lobby on behalf of VCR importation. The VCR coalition retained several law firms including the appointee and his law firm.

The appointee advised that he dealt with low level Japanese company officials and with some Japanese trade association officials. The appointee further advised that he traveled to Japan approximately once a year to learn about new Japanese technologies in the market.

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The appointee advised that the VCR coalition was primarily represented by their American lawyers and that he (appointee) dealt with other lawyers and only infrequently with coalition officials and/or Japanese officials. The appointee further advised that his contacts with respect to this client were with the following lawyers:

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The appointee further advised that he also met with Sony Corporation President, A. MORITA, on an occasional basis.

The appointee stated that he would have his assistant, [redacted] provide the FBI at a later date with a complete list of the twenty-five American subsidiaries.

2. Public Employees Benefit Services Corporation (PEBSCO), Columbus, Ohio.

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The appointee advised that [redacted] of PEBSCO, resides in Columbus, Ohio, and can be reached at Telephone Number [redacted]

3. Evergreen International Aviation, (city and street address unknown), Oregon.

The appointee advised that Evergreen International Aviation leases airplanes. The appointee recalled that the company was involved in a bankruptcy matter several years ago with Boeing and retained the appointee and his law firm to handle this matter.

The appointee advised that Evergreen International Aviation is no longer a client. The appointee stated that he

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could no longer recall the name of the President of the Evergreen International Aviation, but that he would have [ ] provide that information to the FBI in the near future.

4. Associated Financial Corporation, 2020 Santa Monica Boulevard, California, Telephone 310-459-5234.

The appointee advised that Associated Financial Corporation builds and manages low and moderate income housing. Although this is one of the appointee's clients, [ ] PATTON, BOGGS, and BLOW is also involved with the client.

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The appointee advised that [ ] of Associated Financial Corporation is [ ]

5. Sedgwick James, Incorporated, 1285 Avenue of the Americas, New York, New York, Telephone 212-830-8324.

The appointee advised that Sedgwick James, Incorporated, is an insurance company and the account is presently handled primarily by the appointee's associate, [ ] at PATTON, BOGGS, and BLOW.

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The appointee further advised that his primary contact at Sedgwick James, Incorporated, has been with [ ] and [ ]

6. Sony Corporation of America, Incorporated,

The appointee advised this client is a spin-off from the VCR Companies Coalition. The appointee further advised that Sony Corporation of America, Incorporated, retained his legal services because of problems that the Japanese were having with minorities in the United States.

The appointee advised that his law firm also does other legal work for Sony Corporation of America, Incorporated, although he is not involved with that.

The appointee advised he primarily dealt with [ ] who is a Japanese-American born citizen and [ ] who is [ ] of Sony Corporation of America, Incorporated.

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The appointee advised he did not have an address or telephone number for the Sony Corporation of America, Incorporated, however his assistant [ ] would locate that information and provide it expeditiously to the FBI.

7. Wayne County, Michigan

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The appointee advised that he was contacted by a representative of Wayne County, Michigan, to assist them in building a new airport. The appointee stated that he had been referred by the City and County of Denver, Colorado, because of work he had performed for that municipality in helping them build a new airport. The appointee advised that [ ] at his law firm handled most of this case and the appointee virtually had no contact with Wayne County officials.

The appointee advised that he did not have a telephone number or address for Wayne County, Michigan, however his assistant, [ ] would provide that information to the FBI as soon as possible.

8. City and County of Denver, Colorado

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The appointee advised that he was retained by the City and County of Denver, Colorado, to do legal work in respect to building a new airport. The appointee further advised he primarily dealt with [ ] however, his associate [ ] at the law firm was also involved with this client.

The appointee advised that his assistant, [ ] would provide information concerning his work in Denver, Colorado, to the FBI at a later date.

9. District of Columbia (Bond Counsel)

The appointee advised that his law firm, PATTON, BOGGS, and BLOW is one of six law firms that serve as counsel to the D.C. Government regarding issuance of D.C. bonds.

The appointee further advised that he dealt with [ ] District of Columbia Government, Washington, D.C., on a rare basis regarding this issue. The appointee further advised that his associate [ ]

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Continuation of FD-302 of RONALD HARMON BROWN, On 12/28/92, Page 10

[ ] at PATTON, BOGGS, and BLOW also was involved with handling this client.

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10. Embassy of Japan, Washington, D.C.

The appointee advised that the Embassy of Japan retained his legal services several years ago with respect to problems that the Japanese were having with American minorities.

The appointee further advised that he had this client before he came to the DNC in February, 1989. The appointee stated that his associate, [ ] (phonetic), also worked on this client.

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The appointee advised the interviewing SA's that during his tenure at DNC he has not conducted any lobbying on behalf of his companies or clients. The appointee advised that he has maintained his clientele at the law firm and briefly touches base with them from time to time primarily to maintain contact. The appointee stated that the bulk of the legal work for his clients is being handled by various attorneys at the law firm. The appointee acknowledged that he has billed his clients for legal consultation and admitted that, on occasion, he has even met with his clients but has done no "heavy lifting".

The appointee added that he is not actively drumming up work for the law firm since he has held his position of Chairman at DNC. However, the appointee did not think that such activity would be unethical or illegal.

With respect to foreign clients, the appointee stated that he would provide the FBI a list of his foreign clients through [ ] at a later date.

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The appointee further advised that his primary foreign client during his employment at the law firm was the Government of Haiti and that he has not performed any legal services for that Government since 1986.

The appointee advised that he was a registered foreign agent with respect to his legal representation of Haiti. With respect to the other foreign clients, the appointee advised that the law firm was registered as the foreign agent. The appointee

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advised that he would provide the FBI with a copy of his foreign agent registration as soon as possible.

The appointee advised that he recalled another foreign client Duty Free Shoppers, Limited. The appointee indicated that Duty-Free Shop was a foreign firm and he has done "straight lawyer work" but nothing that would require foreign registration.

The appointee advised that his involvement with most of the other foreign clients was insignificant and the appointee reiterated that PATTON, BOGGS, and BLOW was the registered foreign agent, not himself.

The appointee provided no additional pertinent information.

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/31/92

RONALD HARMON BROWN (Hereafter referred to as appointee), Chairman, Democratic National Committee (DNC), 430 South Capitol Street, Washington, D.C., was reinterviewed by Special Agents (SAs) [redacted] and [redacted] regarding the appointee's background investigation. Also present during the interview was Counsel for the appointee, [redacted] Attorney, Hogan and Hartson, 555 13th Street, Northwest, Washington, D.C. The appointee voluntarily provided the following information:

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The appointee advised that as Chairman of the DNC, he is invited to attend weekly House Deputy Whip meetings at the United States House of Representatives. The appointee stated that these meetings are held every Thursday, and that over the course of his tenure at the DNC, he has probably attended only 20 percent of the meetings. According to the appointee, these meetings are attended by the House Leadership, Whips, and staff members. BROWN estimated that there are at least 100 people that regularly attend these meetings. BROWN characterized the meetings as having more entertainment value than substance. BROWN stated that at the beginning of each meeting, a mimeographed sheet is passed out to each attendee that contains the House schedule for the upcoming week. Generally House bills are not discussed in any great detail at these meetings. In fact, the appointee could not recall a single detailed discussion on any particular House bill that was discussed at these meetings. BROWN advised that over the last year or so the major discussion at these meetings involved the House Banking scandal.

BROWN advised that he has attended perhaps two other meetings in the last four years on Capitol Hill to discuss Democratic Party related issues. BROWN advised that the primary issue he discussed in these meetings were Campaign Finance Reform. BROWN advised that he has never gathered information regarding any of his law firm clients as Chairman of the DNC while attending Capitol Hill meetings or in the course of his DNC duties. BROWN was asked by the interviewing SAs if he believed

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Investigation on 12/31/92 at Washington, D.C. File # WMFO 161A-HQ-1042752by SA [redacted] and  
SA [redacted] ET:meh Date dictated 12/31/92b6  
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that, as Party Chairman for the Democratic Party he should be able to employ influence to help his law firm clients. In response, the appointee said no, but added that there was nothing in the DNC laws, by-laws or regulations prohibiting this practice.

The appointee strongly emphasized that he has not engaged in any lobbying activities on behalf of his clients since becoming Chairman of the DNC in February, 1989.

Representation of Foreign Government and/or Companies

The appointee acknowledged that he represented the Government of Haiti from approximately 1982 or 1983 to 1986. According to the appointee, the Government of Haiti came to him requesting his legal assistance to represent their government on Capitol Hill, encourage U.S. investment in Haiti, increase American foreign aid to Haiti, and assist that country in obtaining certification of the Caribbean Basin Initiative.

The appointee advised that he dealt primarily with the Foreign Minister of Haiti, JEAN ROBERT ESTIME. The appointee acknowledged that he met JEAN CLAUDE "BABY DOC" DUVALIERS, the President of the Republic of Haiti. The appointee stated that he probably met DUVALIERS four or five times over the approximately three year period that he represented Haiti, and further estimated that he may have met him at least two times a year. The appointee categorized his meetings with DUVALIERS as primarily "courtesy calls".

The appointee advised that he traveled to Haiti a great deal during this time frame.

The interviewing SAs asked the appointee if he had any feelings or concerns over DUVALIERS' well documented human rights violations. In response, the appointee said that he had very negative feelings about DUVALIERS' human rights violations and passed his feelings on to Haitian Officials. The appointee added that he told Foreign Minister ESTIME that Haiti had to clean up its act if it was going to accomplish any of its goals, primary of which was to obtain certification of the Caribbean Basin Initiative. The appointee advised that during his legal representation of Haiti, the government did make strides in

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curbing the human rights violations by reforming labor laws and releasing political prisoners.

The appointee advised that during this time frame, he worked closely with the United States Department of State (USDS). Officials at the USDS considered the appointee to be something of a back door channel into the Haitian government.

Interviewing SAs asked the appointee if he and his law firm (PATTON, BOGGS AND BLOW) had assisted the Haitian government in securing the release of FRANZ BENNETT, a brother-in-law of JEAN CLAUDE DUVALIERS who had pled guilty to drug charges in Federal Court in Puerto Rico during the early 1980's. In response, the appointee advised that at the behest of Foreign Minister ESTIME, he had assisted the Haitian government in securing the release of BENNETT. The appointee explained that the government of Haiti felt that BENNETT was being jailed unfairly and that his jail sentence was too stiff. Interviewing SAs asked the appointee if he agreed with the Haitian's position on BENNETT. The appointee replied that his opinion or feelings in this instance were not relevant and that he was serving his client.

The appointee advised that he has legally represented the Sony Corporation of America since approximately the mid-1980's. Initially, Sony Corporation of America was one of the 25 American subsidiaries of the VCR Coalition.

The appointee advised that during the mid-1980's various Japanese government officials made disparaging remarks about African Americans; subsequently, Sony Corporation of America retained the appointee to improve the African American perception of the Japanese.

The appointee advised that he did not travel to Japan in connection with this client. The appointee advised that he has met A. MORITA (Chairman of Sony Corporation) about two times over the last six to seven years. The appointee stated that he, through his law firm, billed Sony Corporation of America two hours in 1991, and zero hours in 1992.

The appointee advised that he has primarily dealt with [redacted] and [redacted] at Sony Corporation of America, at that company's New Jersey Headquarters (address unknown).

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The interviewing SAs asked the appointee if he had ever represented the government of Oman. In response, the appointee advised that the government of Oman was not his client, however, his law firm did represent that government. The appointee believed that he assisted [REDACTED] PATTON, BOGGS AND BLOW; however, the appointee was unable to recall the nature of the work that he performed for his client. The appointee said that he spoke with [REDACTED] about this issue recently and [REDACTED] could not recall what legal services the appointee provided either. The appointee's records reflect that he billed two hours in 1982 and three hours in 1983 to this particular client.

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The appointee advised that Duty Free Shoppers, Ltd., was a client of his and a foreign company which he believed to be based in Hong Kong. The appointee further advised that Duty Free Shops sells liquor, watches, and other merchandise that travelers purchase. The appointee represented Duty Free Shoppers, Ltd., from approximately 1982 to 1986. During this time frame, the appointee negotiated a duty free concession at Los Angeles Airport for the company. The appointee advised the interviewing SAs that he did not know Duty Free Shoppers, Ltd., was a foreign based company until recently. He further noted that his law firm had done work for the company previously and the law firm had registered with the Department of Justice as a Registered Foreign Agent.

The appointee acknowledged that he represented the Embassy of Japan. Specifically, he counselled low level embassy officials concerning Japan's image on race-related issues. In 1988 and 1989 the appointee believes he billed a total of two or three hours to that client. Furthermore, he has not billed any hours to that client since 1990.

The appointee advised that in 1987 and 1988 he had an Italian client (name unrecalled) which consisted of a group of Italian businesses that were located near a U.S. military base in Italy. According to the appointee, these businesses heard that the U.S. military base was going to close and the businesses retained his law firm to find out if the rumors were true. The appointee assisted his associate, [REDACTED] PATTON, BOGGS AND BLOW, who performed most of the work.

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Interviewing SAs asked the appointee if he was registered with the House of Representatives as a Lobbyist. The

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appointee responded that he believed he has complied with all House of Representatives regulations and that his law firm would have registered him as a Lobbyist, if that was required. However, the appointee had no specific recollection of having done so.

Bond Counsel to the District of Columbia Government

According to the the appointee, he first became aware, through a local newspaper advertisement, that the District of Columbia was seeking a Bond Counsel for its planned issuance of Bonds. According to the appointee, he has been the head of the Finance Department at his law firm for several years and he was interested in getting the law firm involved in the bond business. The appointee stated that he is "red book certified", a requirement necessary to compete for Bond Counsel. The appointee noted that bond work is a very "closed shop" throughout the United States and it is a hard business to break into. The appointee noted that for many years the law firm of MUDGE, ROSE did over one half of the bond work in the United States. The appointee noted that MUDGE ROSE is former President RICHARD NIXON's and former Attorney General JOHN MITCHELL's law firm.

The appointee advised that he responded to the District of Columbia solicitation on behalf of his law firm with a Request For Proposal (RFP) dated June 10, 1991. The appointee further advised that he signed the RFP although other members of the law firm actually put the RFP together. The appointee added that the RFP was basically a standard boiler plate document.

The appointee advised that his law firm was selected as the interim bond counsel to the District of Columbia just to handle one transaction. Ultimately, five other law firms, along with the appointee's law firm, were selected by the District of Columbia to act as bond counsel.

The appointee advised that there were only a few other Washington, D.C., based law firms that responded to the District of Columbia's solicitation for bond counsel. According to the appointee, it was a big advantage to his law firm because the District of Columbia Government wanted a local law firm to have some of this business.

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Interviewing SAs asked the appointee if he was acquainted with Mayor SHARON PRATT KELLY. The appointee advised that he knows Mayor KELLY and characterized categorized his relationship with Mayor KELLY as an "acquaintance". The appointee advised he did not have any official meetings or correspondence with the Mayor over this issue. The appointee did not specifically recall any conversations with Mayor KELLY but acknowledged that he may have mentioned the bond contract to her in an informal setting.

The appointee did not believe that Mayor KELLY was involved in the selection process for bond counsel, nor did he know for certain if the Mayor signed off on the bond counsel selections/contracts.

The appointee never appeared before any District of Columbia committees regarding this issue. The appointee advised that [redacted] and [redacted] at the law firm of PATTON, BOGGS AND BLOW were more involved with the bond counsel contract than he.

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The appointee advised that he dealt with ELLEN O'CONNOR, Deputy Mayor for Finance, District of Columbia, regarding this issue.

The appointee recalled that he had one meeting with O'CONNOR in the summer or fall of 1991 after his law firm had received the bond contract. The appointee further recalled that O'CONNOR was dissatisfied with the speed over which the bond work was progressing at his law firm. Following the meeting with O'CONNOR, the appointee went back to his law firm and "raised hell". After this the law firm resolved the issue.

Concession Deal - 1992 Democratic National Convention

The appointee advised that [redacted] came to the appointee in 1989 and requested the rights to sell concessions at the DNC Bicentennial Celebration. [redacted] told the appointee that, in return for the concessions rights, the DNC would receive royalties for the sale of the concessions. The appointee told [redacted] that he thought that it was a good idea and that it was also a good way for the Democratic Party to raise money.

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The appointee advised the interviewing SAs that there may have been a letter of agreement between [ ] and the DNC regarding the Bicentennial concessions rights. The appointee advised that ultimately [ ] was unhappy with the concession deal because the DNC was uncooperative and/or slow to react to his requests for various things like DNC mailing lists, etc.

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Sometime around the end of 1990 [ ] approached the appointee about obtaining the rights to sell concessions at the Democratic National Convention in 1992. The appointee listened to [ ] proposal; however, did not give [ ] a committal.

Subsequent to [ ] proposal, [ ] This led to questions being raised in the press that the proposed concessions deal with DNC and the appointee's law firm Bond Counsel contract with the District of Columbia had the appearance of impropriety. These accusations led the appointee to call [ ] to meet with him at the DNC where the appointee gave [ ] a letter terminating the Bicentennial Concession deal. The appointee also informed [ ] that he would have no role regarding the concessions at the Democratic National Convention.

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The appointee advised that the DNC does give exclusive concession contracts and can enforce those contracts.

The appointee advised that in 1989 when [ ] first brought this suggestion to him, the appointee was very interested in getting minorities into the concession business. The appointee acknowledged that he and [ ] had even traveled to Detroit, Michigan, together where they visited a concession business. The appointee advised that as far as he could determine there are no African Americans involved in the concession business in the United States. The appointee concluded that there was no DNC money, no contract for services given to [ ] nor was [ ] paid for anything.

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Chemfix Technologies, Incorporated

Interviewing SAs asked the appointee if [ ] had formerly been employed in the New York City Department of Environmental Protection (DEP) during the time frame that DEP was reviewing a proposed \$210 million contract with a corporate affiliate of Chemfix. In reply, the appointee

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acknowledged that [ ] had been employed as a Summer Intern at DEP while she was in law school during the summer of [ ]. The appointee denied that he used any influence with Mayor DINKINS or anyone else in getting [ ]. The appointee admitted that he has been a life long and close friend of Mayor DINKINS, New York City.

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The appointee advised that he did not know when DEP reviewed the \$210 million contract with Chemfix. In fact, the appointee maintained that he had no idea Chemfix was bidding on a contract in New York City. The appointee acknowledged that he was a member of the Board of Directors and a major stockholder with Chemfix Technologies, Incorporated; however, he had no recollection of the New York City contract being discussed at Chemfix Board meetings.

The appointee advised that the Chemfix Board of Directors probably meets on a quarterly basis and that he believed he attended only a couple of Board meetings since 1989.

The appointee emphatically denied that he contacted any New York City officials regarding the Chemfix contract. The appointee further advised that he never discussed this issue with Mayor DINKINS. Furthermore, Chemfix officials never asked the appointee to perform any work for that company regarding the New York City contract.

The appointee advised that he has not been contacted by any law enforcement agency or the District Attorney's Office regarding this matter.

The appointee was asked by the interviewing agents if the law firm of PATTON, BOGGS AND BLOW handled negotiations for Chemfix regarding the New York City contract. In response, the appointee advised that he was not aware if his law firm had been involved in the negotiations for this contract.

The appointee advised that he is not an official of Air and Water Technologies, Incorporated, nor has he ever been an official of that company.

The appointee stated that he believed he heard through the press that Chemfix had a problem with one of their contracts

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in Boston, Massachusetts, however, he was not aware of the nature of the problem.

The appointee stated that he has known Mayor TOM BRADLEY, Los Angeles, California, for a long time and he considers Mayor BRADLEY an acquaintance. The appointee said that through Board meetings at Chemfix, he was aware that Chemfix had a contract with the city of Los Angeles although he never discussed this contract with Mayor BRADLEY.

At this point in the interview, the interviewing agents asked the appointee if he was aware of a letter from Mayor TOM BRADLEY to Mayor DINKINS dated March 7, 1990, in which Mayor BRADLEY had recommended that New York City hire Chemfix. The appointee replied that he had no knowledge of any such letter.

At this point in the interview, the appointee stated that he did not believe that Chemfix was selected for the New York City contract despite numerous press accounts which indicated that the company had been selected by New York City DEP for the \$210 million contract to dispose of sewage.

The appointee was asked if he had executed stock options which he held as Director of Chemfix in 1990. The appointee pointed out that he had exercised his Chemfix stock options several times prior to this particular transaction in July, 1990. The appointee explained that in July, 1990, he exercised a stock option he had as a member of the Board of Directors of Chemfix to purchase Chemfix stock at \$2.57 per share which was substantially reduced from the market price of \$10.75 a share. This stock option was restricted from sale for two years. Furthermore, he exercised the stock option on 7/12/90 which was just prior to its expiration on 7/19/90. The appointee maintained that he never profited from this purchase of Chemfix stock, of which he purchased 5000 shares, and that its current value is approximately \$1 per share.

The appointee further advised that in addition to the approximately 16,000 shares of Chemfix stock, he currently owns, he formerly owned approximately 16,000 shares of Chemfix stock as a part of his pension plan. The appointee noted that this stock was recently sold by Prudential Bache (investment management company for appointee) and that the sale of this stock lost money.

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The appointee advised that he did not know a Texas stock analyst by the name of [redacted] and that he was not guilty of any insider trading with respect to the purchase of the Chemfix stock in 1990.

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The appointee denied that he ever spoke to [redacted] about the Chemfix New York City contract.

1992 Democratic National Convention

The appointee advised that the Democratic Party has a Site Selection Committee which is comprised of 50 prominent Democrats who travel around the country in advance of the Democratic National Convention for the purposes of selecting a city to host the convention. The appointee stated that this committee of 50 people are "wined and dined" throughout the country by various city officials and businessmen for the purposes of trying to land their city the right to hold the Democratic National Convention.

With respect to the 1992 Democratic Convention, the Site Selection Committee narrowed the site down to three cities, Houston, Cleveland, and New York City, and eventually recommended New York City as their choice.

The appointee advised that as the Chairman of the DNC he ultimately decided which city would host the convention. The appointee advised the interviewing SAs that from the outset he wanted the convention to be in New York City because it is his home town. Therefore, when the Site Selection Committee chose New York City, he was delighted with their recommendation.

The appointee emphatically denied that there was any connection between the award of the Chemfix contract at New York City in April, 1990, and the subsequent selection by the appointee of New York City to host the 1992 Democratic National Convention.

Interviewing SAs asked the appointee if he had ever submitted an affidavit to New York City or elsewhere denying that he had exerted influence with New York City officials over the Chemfix contract. The appointee initially responded that he had never filed an affidavit regarding this issue, however, the appointee later recalled that he had provided an unsolicited

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affidavit to Chemfix denying any involvement in the New York City contract.

Capital PEBSCO

The appointee advised that PEBSCO is one of the oldest and largest administrators of public employee deferred compensation plans in the United States. It is endorsed by the Conference of Mayors and the National Association of Counties.

PEBSCO is the record keeper and marketer of compensation plans and, according to the appointee, PEBSCO does not manage the money.

The appointee recalled that in approximately 1985 the District of Columbia put out an RFP regarding the Public Employee Deferred Compensation Plan. The appointee knew there would be a lot of competition for this contract. [redacted]

[redacted] came to the appointee and asked him to become involved in a joint venture with PEBSCO in order to respond to the District of Columbia's RFP. As a result, the appointee set up his own company, Capital PEBSCO. The District of Columbia Government subsequently awarded the contract to Capital PEBSCO and, to the appointee's surprise, then Mayor MARION BARRY (District of Columbia) split the contract and awarded approximately 30 percent of the services to Copeland Associates.

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The appointee advised that approximately one year ago the D.C. contract with Capital PEBSCO was up for renewal and he (appointee) along with [redacted] and [redacted] of Capital PEBSCO, appeared before the D.C. Selection Committee on December 2, 1991, and made a presentation in behalf of Capital PEBSCO. At the time of his presentation, the appointee would have been happy to maintain status quo, i.e., sharing the contract with Copeland Associates. The appointee was surprised to learn that the D.C. Government decided to drop Copeland Associates and award the entire contract to Capital PEBSCO. The appointee advised that very few cities have split administrators for public deferred compensation plans because it creates a hardship for the city government inasmuch as they have two administrators to deal with.

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The appointee advised that he did not have any conversations, correspondence, or contact with Mayor SHARON KELLY or any other high D.C. Government officials outside of his appearance before the D.C. Selection Committee in 1991 regarding the renewal of the Capital PEBSCO contract.

The appointee was asked if he had ever taken any business trips abroad for his law firm or any of his companies since becoming DNC Chairman. In response the appointee stated that he believed he traveled to Japan within one month of assuming chairmanship of the DNC (2/89) with respect to a Japanese client and that since then he has not traveled abroad on law firm business.

The appointee was asked if he was registered as a foreign agent regarding his representation of the Home Recording Rights Coalition inasmuch as many of these companies were U.S. subsidiaries of Japanese companies. The appointee responded that he believed his law firm contacted the Department of Justice regarding this issue and that his law firm may have been registered regarding these clients. The appointee was asked if there were any ethics laws governing his doing business with the coalition since he had dealt with the coalition as counsel to the Senate Judiciary Committee. The appointee replied that he never dealt with the coalition in his Senate job and to his knowledge, there are no restrictions on what former Senate employees can do or practice once they leave the Senate.

The appointee was asked if he was aware that the Environmental Industrial Research Associates, a wholly owned subsidiary of Chemfix had pled guilty on February 6, 1992, to a Grand Jury indictment for defrauding the Environmental Protection Agency. The appointee responded that he was not aware and had never heard of the indictment.

Interviewing SAs asked the appointee if he was on the Board of Directors of the National Bank of Washington and if he had any business relationships with the National Bank of Washington. The appointee advised that he was not on the Board of Directors of that bank and that he only had business relationships to the extent that the DNC had banked there. The appointee acknowledged that he had directed the DNC to withdraw its account prior to the bank going into receivership. The appointee explained that the bank's financial difficulties were

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well documented in the press and that he would be remiss not to close the DNC account prior to the bank failing.

At the conclusion of the interview, the appointee through his counsel, [REDACTED] provided the FBI with a copy of an RFP regarding the Bond Counsel contract to the District of Columbia Government dated June 10, 1991, and signed by the appointee.

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The appointee provided no additional pertinent information.

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MISCELLANEOUS

On 12/31/92, the appointee's secretary [redacted]  
provided the attached documents pertaining to the appointee's  
purchase of Chemfix stock via facsimile to Special Agent [redacted]  
[redacted]

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## FULL SUBSCRIPTION FORM

To Be Executed by the Registered Holder if he Desires  
to Exercise in Full the Within Option

The undersigned hereby exercises the right to purchase the 5,000 shares of Common Stock covered by the within Option at the date of this subscription and herewith makes payment of the sum of \$ 12,850.00 representing the Purchase Price of \$ 2.57 per share in effect at this date. Certificates for such shares shall be issued in the name of and delivered to the undersigned, unless otherwise specified by written instructions, signed by the undersigned and accompanying this subscription.

Dated, July 12, 1990.

Signature

Address 2722 Unicorn Lane, N.W.  
Washington, D.C. 20015

Social Security No. 095-32-5852

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MISCELLANEOUS

On 12/31/92, the appointee's secretary, [REDACTED]  
provided the attached documents pertaining to the appointee's  
registration as a Foreign Agent via facsimile to Special Agent  
[REDACTED]

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OMB No. 00215  
Approval For Oct. 31, 1981UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530RECEIVED  
CRIMINAL DIVISION

## SHORT-FORM REGISTRATION STATEMENT

OCT 15 3 02 PM '82

Under the Foreign Agents Registration Act of 1938, as amended  
INTERNAL SECURITY  
SECTION  
REGISTRATION UNIT

Each partner, officer, director, associate, employee and agent of a registrant is required to file a short form registration statement unless he engages in no activities in furtherance of the interests of the registrant's foreign principal or unless the services he renders to the registrant are in a secretarial, clerical, or in a related or similar capacity.

1. Name <b>Ronald H. Brown</b>	Registration No. <b>2165</b>
2. Residence Address <b>7935 Orchid St., N.W. Washington, D.C. 20012</b>	3. Business Address <b>2550 M Street, N.W. Washington, D.C. 20037</b>
4. Date and Place of Birth <b>August 1, 1941 Washington, D.C.</b>  Present Citizenship <b>U.S.A.</b>	5. If present citizenship was not acquired by birth, indicate when, where, and how acquired.

6. Occupation: **Lawyer**

7. What is the name and address of the individual or organization whose registration made it necessary for you to file this statement?

Name **Patton, Boggs & Blow**Address **2550 M Street, N.W.  
Washington, D.C. 20037**

8. List every foreign principal of the individual or organization named in Item 7.

**SEE STATEMENT A ATTACHED**

9. Indicate your connection with the individual or organization named in Item 7:

☐ partner☐ director☐ employee☐ officer☐ associate☐ agent☐ other (specify) \_\_\_\_\_

10. Describe in detail all services which you have rendered or will render to the individual or organization named in Item 7. If you are no longer rendering such services, indicate period of past services. (If space is insufficient, a full insert page must be used.)

The undersigned is engaged in the practice of law as a partner in the registrant firm, Patton, Boggs & Blow. As such, he may be engaged in the performance of legal and related services on behalf of the clients for which the registrant firm has filed a Registration Statement under the Act (see Registrant's Form DJ-301). Such services may include formal and/or informal advocacy of the clients' interests before U.S. Government agencies, in the courts and before the Congress. Such services may also include advice and counsel with respect to the domestic or foreign policies of the United States and other countries.

11. Do any of the above described services include political activity as defined in the footnote below?  
☒ Yes ☐ No

If yes, fully describe such political activity

Formal and/or informal advocacy before the U.S. Congress, Courts, and Administrative Agencies; advice and counsel relating to the domestic and foreign policies of the United States.

12. The services described in Item 10 are to be rendered on a

☐ full time basis

☐ part time basis

☒ special basis

13. What compensation are you receiving or will receive for above services?

SEE STATEMENT B ATTACHED

☐ Salary: Amount \$ \_\_\_\_\_ per \_\_\_\_\_

☐ Commission at \_\_\_\_\_ % of \_\_\_\_\_

☐ Fee: Amount \$ \_\_\_\_\_

☐ Other thing of value \_\_\_\_\_

14. What compensation or thing of value have you received to date for above services?

Date

From Whom Received

Amount

SEE STATEMENT B ATTACHED

15. During the period beginning 60 days prior to the date of your obligation to register to the time of filing this statement, did you make any contributions of money or other things of value from your own funds or possessions and on your own behalf in connection with an election to political office or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

Date

Amount of  
thing of value

Name of  
political  
organization

Name of  
candidate

October 8, 1982

Date of Signature

Thomas D. H. Jones  
Signature

Subscribed and sworn to before me at

this

8th

day of

October, 1982

Washington D.C.

[Redacted]

My commission expires

March 14

, 1982.

Footnote: Political activities as defined in Section 1(c) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## ATTACHMENT A

8. The Government of the Sultanate of Oman  
Procesadora de Carne, S.A.  
Duty Free Shoppers, Ltd.  
Hampton-Windsor (Republic of Zaire  
Republic of Gabon  
Asociacion de Azucareros de Guatemala  
Japan Air Lines  
E. Palicio y Cia., S.A.  
Por Larranaga, Fabrica de Tabacos, S.A.  
Menendez, Garcia y Cia., Ltda.  
Republic of Haiti

## STATEMENT B

13 & 14. The undersigned receives a fixed percentage of the total net profits of the partnership which is agreed to in advance by the partners and is unrelated to any work which the undersigned may undertake on behalf of any foreign principal.

WMFO 161A-HQ-1042752  
GLC

MISCELLANEOUS

On 1/4/93, [REDACTED] Assistant to the Chairman for Transition, provided to Special Agent, [REDACTED] via facsimile, the attached affidavit which the appointee, RONALD HARMON BROWN, had previously provided to Chemfix Technologies, Incorporated.

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## AFFIDAVIT

DISTRICT OF COLUMBIA

COUNTY OF

The undersigned, Ronald H. Brown, being duly sworn, hereby deposes and says:

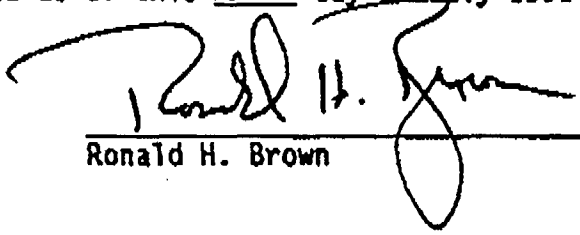
1. I am a Director of Chemfix Technologies, Inc. (CTI), a Delaware corporation, with offices located at 2424 Edenborn Avenue, Suite 620, Metairie, Louisiana 70001. I am, in addition, a practicing attorney and a partner in the law firm of Patton, Boggs & Blow since 1981. I am Chairman of the Democratic National Committee and serve as a Trustee of Middlebury College. I am Chairman of the Senior Advisory Committee of the Institute of Politics at Harvard University. I reside in the Washington, D.C.
2. In my capacity as a Director of CTI, I have knowledge of and am familiar with Renewable Earth Products of New York City ("REPNYC"), a general partnership organized and existing under the laws of the State of New York (the partners of which are Organic Resources Management of New York City, Inc., an indirect subsidiary of Air and Water Technologies Corporation (AWT) and Chemfix Municipal Ventures of New York City, Inc., a wholly-owned subsidiary of CTI, the mailing address of said partnership being Route 22 West and Station Road, Branchburg, New Jersey 08876).
3. I am aware that REPNYC contemplates entering into a Supply and Service Agreement with the Department of Environmental Protection of the City of New York, (the "Service Agreement"), pursuant to which REPNYC will agree to own, finance, construct and operate a facility at Ward's Island, New York, to treat municipal wastewater sludge with REPNYC's proprietary product and to cause such treated municipal wastewater sludge to be delivered to landfills designated by the City of New York.
4. In connection with REPNYC's negotiations with the City of New York with respect to the Service Agreement, I have not, nor, to the best of my knowledge, has anyone associated with or employed by Chemfix Municipal Ventures of New York City, Inc., or CTI, or any of CTI's direct or indirect subsidiaries, at any time contacted or attempted to contact, directly or indirectly, in person, by telephone, writing or otherwise, any elected official or employee of the City or State of New York in an effort to have any such official or employee exert their influence on behalf of any of REPNYC, Chemfix Municipal Ventures of New York City, Inc., CTI, or any of CTI's, direct or indirect, subsidiaries in connection with the selection and award of the Service Agreement to REPNYC.



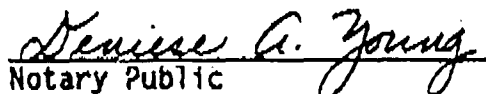
-2-

5. I have not contacted or attempted to contact any person, firm, corporation, partnership or joint venture for the purpose of asking such third party or parties to communicate with any elected official or employee of the City or State of New York for the purpose of exerting their influence on behalf of any of REPNYC, Chemfix Municipal Ventures of New York City, Inc., CTI, or any of CTI's direct or indirect subsidiaries in connection with the selection and award of the Service Agreement to REPNYC.
6. I have no personal knowledge that any person, firm, corporation, partnership or joint venture has sought to communicate with any elected official or employee of the City or State of New York for the purpose of asking such official or employee to exert his influence on behalf of REPNYC, Chemfix Municipal Ventures of New York City, Inc., CTI, or any of CTI's direct or indirect subsidiaries in connection with the award of the Service Agreement to REPNYC.
7. I have no personal knowledge that the United States Securities and Exchange Commission ("SEC") is investigating either CTI or any of its officers, directors or affiliates for any violations or alleged violations of the Securities Act of 1933, as amended (the "1933 Act"), or the Securities Exchange Act of 1934, as amended (the "1934 Act"), or any rules or regulations promulgated under the 1933 Act or the 1934 Act, whether arising out of or relating to the negotiation of the Service Agreement or otherwise.
8. I have not purchased any securities of either CTI or AWT while in possession of any material non-public information regarding AWT or CTI, including but not limited to the potential award of the Service Agreement to REPNYC.

IN WITNESS WHEREOF, I have set my hand as of this 16th day of July 1991.

  
\_\_\_\_\_  
Ronald H. Brown

Subscribed and sworn to before  
me this 16th day of July 1991

  
\_\_\_\_\_  
Notary Public

My Commission Expires March 31, 1992

PROFESSIONAL BIOGRAPHIES OF SELECTED MEMBERS OF  
PUBLIC FINANCE PRACTICE GROUP

RONALD H. BROWN

Mr. Brown joined Patton, Boggs & Blow in 1981 as a partner. He is resident in the firm's Washington office. Mr. Brown's law practice has included counseling in a wide variety of areas, including international trade, business law, legislative advocacy, and municipal finance. He now serves as Chairman of the Democratic National Committee.

Mr. Brown has been General Counsel and Staff Director in the Office of Senator Edward M. Kennedy (D-Mass.). He also was Chief Counsel of the United States Senate Committee on the Judiciary. Prior to that, Mr. Brown served as Deputy National Campaign Manager for the 1980 Kennedy Presidential Campaign and manager of the successful California primary campaign. Mr. Brown served as Convention Manager for the 1988 Jackson campaign and later as senior political advisor to the Dukakis/Bentsen campaign.

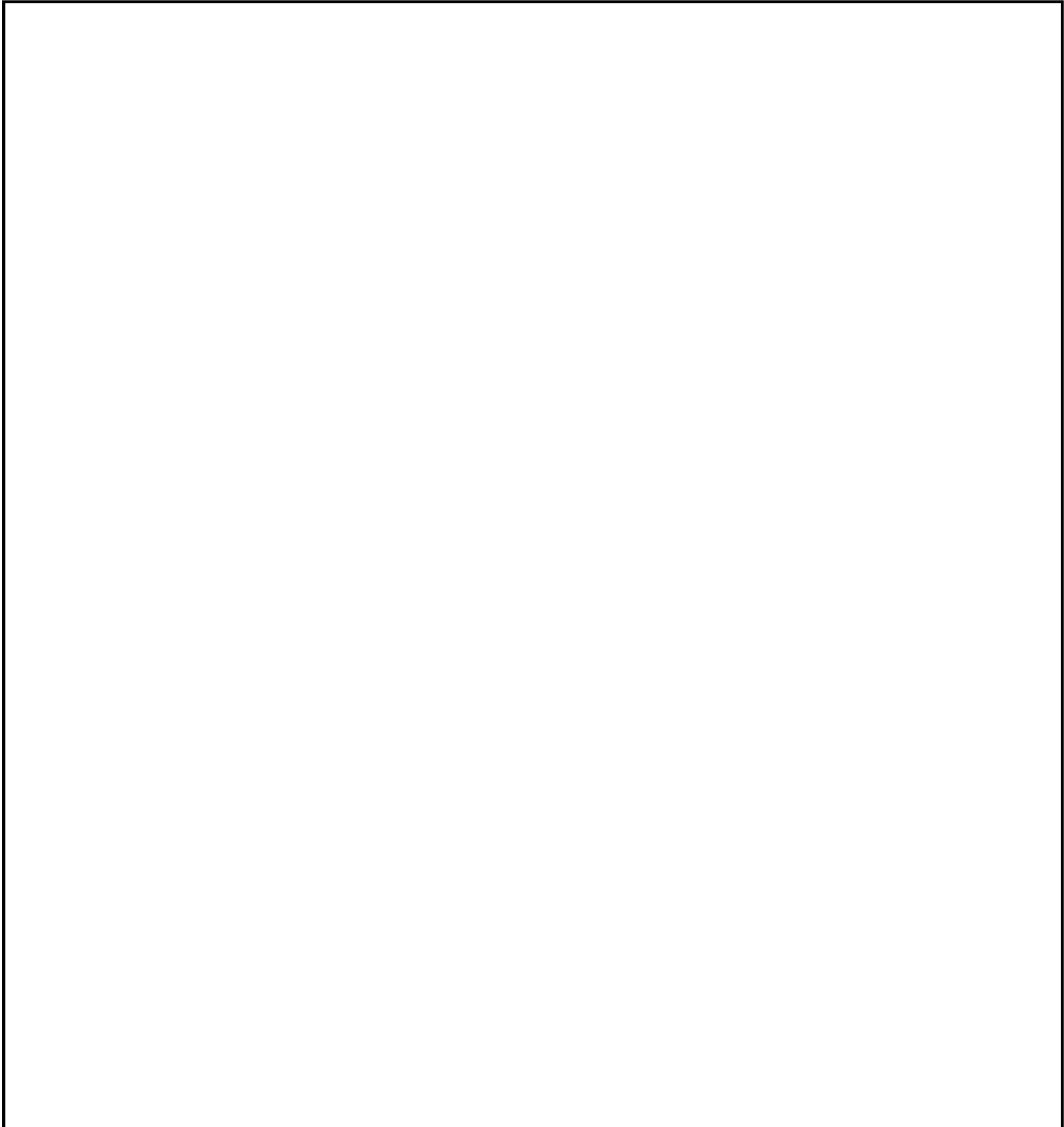
From 1973 to 1979, Mr. Brown served as the National Urban League's chief representative and spokesman in the nation's capital, as Vice President for Washington Operations and Washington Bureau Director. He joined the League in May 1967 and progressively moved through the ranks of the organization, holding such positions as General Counsel and Deputy Executive Director.

In 1980, Mr. Brown was a Fellow at the Institute of Politics, John F. Kennedy School of Government, Harvard University. He now serves as Chairman of the Senior Advisory Committee of the Institute. He is a trustee of Middlebury College and previously served as Chairman of the Board of Trustees of the University of the District of Columbia. He was a visiting professor in Community and Poverty Law at the State University of New York in 1972 and a guest lecturer at the University of the Phillipines in the Summer of 1970 and at the University of Louisville in the Fall of 1970.

Mr. Brown is a member of the Standing Committee on Law and the Electoral Process of the American Bar Association and is listed as a municipal bond attorney in The Bond Buyer's Directory of Municipal Bond Dealers of the United States (the "Red Book"). He has served as Legislative Chairman and member of the

Executive Committee of the Leadership Conference on Civil Rights and as a member of the Federal Home Loan Bank Board Advisory Council, the U.S. National Commission to UNESCO, and on the governing boards of many diverse business, political, and social action organizations.

Mr. Brown received his law degree from St. John's University School of Law in 1970 and his Bachelor of Arts degree from Middlebury College in 1962.



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EMPLOYMENT

PATTON, BOGGS AND BLOW  
2550 M Street, Northwest  
Washington, D.C.  
1981 - Present

The following investigation was conducted by Special Agent (SA) [redacted] on December 31, 1992, regarding the appointee, RONALD HARMON BROWN:

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[redacted] for the above mentioned law firm, corporate finance and bond work, advised that he has known the appointee on a professional basis since the appointee joined the firm in [redacted]. He advised that he has a favorable opinion of the appointee and that the appointee has done an outstanding job for the firm. He stated that he has found the appointee to be a very competent and knowledgeable attorney. He further stated that the appointee is partly responsible for the firm obtaining the District of Columbia Government as a client in three separate bond issues. He stated that the appointee advised partners of the firm that the bond work would be an excellent opportunity for the firm. He stated that he and two other partners, [redacted] wrote the proposal and prepared the bid which was submitted to the District of Columbia Government for approval. He stated that the appointee did not draft any of the documents for the proposal. He stated that the firm won the bid that it submitted based on the firm's technical qualifications and competency.

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[redacted] advised that at the time BROWN knew very little about the bond issuances and work. He stated that BROWN is a good learner and that he naturally has learned about bond issues. He stated that BROWN has educated himself about the issues in that he could talk to members of the District Government when he would see them from time to time. He further stated that BROWN has never been involved in any day-to-day work on the bond issues. [redacted] did state, however, that he has kept the appointee advised on a regular basis about what the issues are and consulted with him on a need basis.

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[redacted] stated that the appointee has not conducted any lobbying activities to enhance the business of PATTON, BOGGS AND BLOW, to the best of his knowledge, while Democratic National Chairman (DNC).

He further advised that the appointee was a registered foreign agent and as such was able to provide representation of foreign governments and companies on behalf of the company. He stated that the only foreign activity that he is aware of is when the appointee represented the government of Haiti, however, he could not recall the exact year nor the specifics of that particular case in that he did not have a need to know what was going on with that case.

[redacted] advised that he was unaware of any concession deal between the appointee and [redacted] regarding the 1992 Democratic National Convention which was held in New York City.

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[redacted] further stated that he has no knowledge of the appointee's involvement with Chemfix.

[redacted] further stated that he had no knowledge of the appointee's involvement with Capital PEBSO.

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[redacted] advised that he has a high regard for the appointee both as a person and as an attorney, and that the appointee is sufficiently familiar with legal matters as they pertain to political matters. He advised that the appointee is ethical, fair and unbiased.

[redacted] stated that the appointee is in good mental and physical health, and appears to be living within his financial means. He has no reason to believe the appointee to have any history of alcohol or prescription drug abuse, or to have any connection with illegal drugs. He is aware of nothing which could be used to blackmail or influence the appointee.

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[redacted] advised that he has absolutely no reason to question the appointee's character, associates, reputation, or loyalty to the United States Government, and believed the appointee to be well suited for access to classified or sensitive information. VOGEL highly recommended the appointee for a position of trust and confidence with the United States Government.

[redacted] advised that he has known the appointee on a professional basis since the appointee joined the firm in [redacted]. He stated that he has found the appointee to be a very competent and knowledgeable attorney, who is very astute. He stated further that he admired the appointee's thinking ability and his judgement. He further stated that he has

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found the appointee to be a good person who is adroit, easy to get along with, honest, trustworthy, and reliable. He continued that as far as he knows the appointee has no questionable associates, and is of good character. He knows of no prescription drug or alcohol abuse, nor any involvement with illegal drugs. The appointee is considered to be living within his financial means, and seems to be healthy both mentally and physically. He further stated that the appointee has never expressed or manifested any bias or prejudice against any individual or group based on sex, race, color, religion, national origin, handicap, or age.

[ ] advised that he is unaware of any time that the appointee has lobbied to solicit business for the partnership, but has remained as a partner with the firm since taking over as the DNC. He noted that the appointee works full-time as the DNC.

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[ ] advised that the firm is registered with the Department of Justice to represent foreign governments and companies. He further stated that from time to time that the law firm adds and subtracts partners to the list of registered foreign agents as needed. He stated that the firm has been registered with the Department of Justice since the early 1970's. He further advised that the appointee had been a registered agent for a time while he was with the law firm, however, he was not familiar with any of the appointee's dealings in this area.

[ ] further advised that he knows that the firm has been the District of Columbia Bond Counsel since 1991. He stated, however, that he is personally not involved with the handling of the bond issues, and that he is not knowledgeable in this area.

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[ ] further stated that he had no knowledge of the appointee being involved in a proposed concession deal regarding the 1992 Democratic National Convention, the appointee's involvement with Chemfix, nor is he aware of any dealings by the appointee with Capital PEBSCO. [ ] further stated that to the best of his knowledge, he has no information suggesting any type of conflict of interest allegations in dealings involving the appointee.

[ ] concluded by stating he believes the appointee to be loyal to the United States Government, and recommends him for a position of trust and confidence with the United States Government.

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[redacted] advised that he has known the appointee and the appointee's family both professionally and socially for the past [redacted] years. He describes the appointee as a good person, who is stable, practical, cool under fire, smart, honest, trustworthy, and reliable. He further stated that the appointee also has exhibited over the years excellent judgement in all his dealings.

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[redacted] further stated that the appointee is a great strategist with a keen ability to attract new business for the firm. He further stated that the appointee is also able to administer to the client's needs by giving sound advice.

When asked if the appointee had ever used his position as DNC to lobby or solicit business for the firm [redacted] responded by stating that the Chairmanship is an appointment on a voluntary basis. He further stated that to the best of his knowledge, that the appointee receives no salary for his involvement with the Committee. He went on to state that the DNC is elected by the Democratic members of the Committee and that it is not a public corporation or government entity. He further stated that the Chairmanship is not paid a salary with any of the taxpayers' money, and therefore, the Senate for Public Integrity has no right to pass judgement on any of the Chairmanships whether Republican or Democratic. He further stated that if the DNC is not performing his duties, that the Committee would get rid of him immediately. [redacted] further stated that the appointee still draws partnership money from the law firm, and that if he can create new business for the firm through his contacts in the Democratic Committee that there is nothing illegal or immoral about it. [redacted] stated that BROWN has done nothing immoral or illegal or unethical as long as he has known him. He further stated that the appointee is the most honest and moral person he has ever met.

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[redacted] continued that to his knowledge, the appointee neither uses illegal drugs, nor abuses alcoholic beverages. He is aware of no prescription drug abuse, and considers the appointee to be in good mental and physical health. The appointee is not known by him to have any financial difficulties, and seems to be living within his means. He further stated that the appointee has never expressed or manifested any bias or prejudice against any individual or group, based on sex, race, color, religion, national origin, handicap, or age. He concluded by stating he had no reason to question the appointee's loyalty to the United States Government, or any of his associates, and recommends him for a position of trust and confidence with the United States Government.

[redacted] advised that he has known the appointee both socially and professionally for the past [redacted] years. He stated that he has found the appointee to be a very engaging, bright, smart, straightforward person, who has always been fair, honest, trustworthy, and reliable. He further stated that the appointee is a very competent attorney, who is intelligent, well rounded and possesses good judgement. He further stated that to the best of his knowledge, he is aware of no instances which would involve conflict of interest on the part of the appointee.

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[redacted] stated that he is unaware of any lobbying activities on the part of the appointee while he has been the DNC to enhance business for the law firm.

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[redacted] further advised that he knows that the appointee was a registered foreign agent and represented a foreign government and foreign companies in the past, however, he could not recall any specific cases. He further stated that to the best of his knowledge, there were no improprieties on the part of the appointee while handling these matters. He stated that with regard to the firm acting as a bond counsel to the District of Columbia, he is aware that the firm submitted a bid to the District of Columbia Government to handle bond issuances, and that the firm's bid was accepted and they are doing bond work for the District of Columbia Government. He stated, however, that that is not his area of expertise, and that he does not know anything more about this part of the business.

[redacted] stated that he has no knowledge of the appointee being involved in any concession deal regarding the 1992 Democratic National Convention in New York City.

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[redacted] stated that the appointee is on the Board of Directors with Chemfix, however, he has never discussed this matter with the appointee, nor does he have any knowledge of the appointee's dealings with Chemfix.

[redacted] further stated that he is not familiar with a company by the name of Capital PEBSCO.

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[redacted] stated that he is not aware of any negative or derogatory information in connection with the appointee or his associates, and knows of no alcohol or prescription drug abuse, nor any involvement with illegal drugs. He knows of no financial difficulties on the appointee's part, nor any mental or physical problems that might affect his work performance. He further stated the appointee had never expressed or manifested any bias



or prejudice against any individual or group, based on sex, race, color, religion, national origin, handicap, or age. He indicated that he believes the appointee to be loyal to the United States Government, suitable for access to classified and sensitive information, and recommends him for a position of trust and confidence with the United States Government.

[redacted] advised that she has known the appointee for the past [redacted] years (since [redacted]). She stated that she has been [redacted]. She stated that the appointee is a great boss, and a person who is easy to get along with and work with. She stated that she knows the appointee professionally, however, she has not been invited to social events such as family parties and other socials involving the appointee as a partner of the firm. She stated that she has found the appointee to be of the highest character, an outgoing person, honest, trustworthy, and reliable.

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[redacted] stated that the appointee has not "worked" on clientele matters for the partnership since he took over the Chairmanship of the Democratic National Committee. She stated, however, that the appointee is still a partner with the firm, and that he is consulted by various people in the firm regarding clients, and legal matters. She stated that as far as she knows the appointee is paid out of the partnership draw money, however, she does not know the specifics of how or how much the appointee is paid.

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[redacted] advised that she is not aware of any lobbying activities by the appointee to enhance business for the law firm while he has been the DNC. She further noted that since he has been the Chairperson, his itinerary and schedule has been maintained by his secretary at the Democratic National Committee. She further stated that she has over the past [redacted] written the checks to pay his personal bills adding that the appointee comes in after working hours to sign the checks, to plan any of his personal travel plans, and assist him upon his request.

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[redacted] advised that the appointee had been registered as a foreign agent and represented the government of Haiti several years ago. She noted that the appointee has done no work in this area or for the firm in the past four years. She noted, however, that in March, 1989, shortly after the appointee became the Committee Chairman (February, 1989), the appointee made a trip on behalf of the law firm to Japan. She stated that she could not recall the exact client or the exact nature of his trip to Japan, however, the trip had been planned for months prior to

him being nominated and selected as the Chairman of the Democratic National Committee. She reiterated the fact that the travel plans and business for this particular client had been prepared prior to his involvement as the DNC. She further stated that all work and trips that he has made in the past year has been party related or personal in nature. She noted that the appointee on one occasion, while traveling to the West Coast on party business, stopped in Denver for the ground breaking ceremony on a project involving one the of firm's clients. She stated that the trip to Denver was paid out of his personal account. She noted also that the appointee got his registration in order to help the government of Haiti, but was unable to provide any additional information regarding this particular matter. She further advised that the registration was terminated in late 1992.

[redacted] advised that she was unaware of the appointee's involvement with the firm obtaining the bond issuances for the District of Columbia Government.

[redacted] further stated that she was unaware of any concession deal involving the 1992 Democratic National Convention.

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[redacted] further stated that she has no knowledge of the appointee's activities involving Chemfix.

[redacted] stated that the appointee is involved with Capital PEBSCO. She stated that this was a joint venture with a company named PEBSCO located in Columbus, Ohio. She stated that the Capital portion of the firm is the appointee's business and that he was merely their District of Columbia presence representing them in the Washington area. She stated that as far as she knows all the work for this particular project is conducted out of Columbus, Ohio.

[redacted] advised that to the best of her knowledge that the appointee has done no client work for the firm for the past four years. She did state, however, that he has billed several clients a minimum amount of hours in order to trigger the computer system to kick in the clients who are on retainer. She further advised that the appointee has met with clients who come into town from time to time, however, to the best of her knowledge, he has not conducted any business on behalf of the law firm.

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[redacted] advised that to her knowledge the appointee has no financial difficulties, and is loyal to the Government of the United States. She could think of no reason to question the appointee's reputation, character, or personal associates, and believed the appointee to be healthy both mentally and physically. She does not know the appointee to abuse alcohol or prescription drugs, nor to be involved in any way with illegal drugs. She further stated that the appointee has never expressed or manifested any bias or prejudice against any individual or group, based on sex, race, color, religion, national origin, handicap, or age. She concluded by recommending the appointee for a position of trust and confidence with the United States Government.

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[redacted]  
[redacted] for the above mentioned law firm, advised that she has known the appointee on a professional basis [redacted]. She stated that the appointee is very rarely in the office in that he has other duties as the Chairman of the Democratic National Committee. She describes the appointee as a nice person who she has always known to be honest, trustworthy, and reliable. She advised that she knows of no reason to question the appointee's reputation, associates, or loyalty to the United States Government. She further advised that she does not know the appointee to use illegal drugs, or to abuse alcohol or prescription drugs. She considers the appointee to be in good health both mentally and physically, and to be living within his financial means. She further stated the appointee has never expressed or manifested any bias or prejudice against any individual or group, based on sex, race, color, religion, national origin, handicap, or age. She concluded by recommending the appointee for a position of trust and confidence with the United States Government.

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WMFO 161A-HQ-1042752

JLM:meh

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CO-WORKERS

The following investigations were conducted by Special Agent (SA) [REDACTED] on December 31, 1992, regarding the appointee, RONALD HARMON BROWN:

[REDACTED]  
PATTON, BOGGS AND BLOW  
2550 M Street, Northwest  
Suite 800  
Washington, D.C.

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On December 31, 1992, [REDACTED] Administrator, PATTON, BOGGS AND BLOW, advised that he has known the appointee since [REDACTED] stated that he retired from [REDACTED] and became the Administrator at the law firm. [REDACTED] advised that his association with BROWN is strictly on a professional basis, and he has never had any social contact with BROWN outside of the office.

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[REDACTED] stated that without authority from one of the partners or the office manager, he would not be able to make available any information whatsoever regarding compensation for BROWN. [REDACTED] stated that he does not feel it would be appropriate in his position [REDACTED] to make this confidential information regarding BROWN available for review.

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[REDACTED] stated that in view of the fact that he is not a lawyer in the firm, he could not make any comments regarding BROWN from a professional ability standpoint. [REDACTED] stated that he would be able to comment regarding BROWN's integrity and his honesty, but would not be able to comment regarding his capability.

[REDACTED] described BROWN as being a very honest individual, who is straightforward, and an intelligent and organized individual. [REDACTED] stated that he knows of nothing derogatory about BROWN, and has never heard of anything derogatory about BROWN and felt that from the comments made throughout the office, that BROWN is very well respected by his peers. [REDACTED] stated that he has no knowledge of BROWN ever using or selling illicit drugs, or of abusing alcohol. [REDACTED] described BROWN as being a very unbiased individual who treats everyone the same, and [REDACTED] had no knowledge of any complaints ever filed

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against BROWN. [ ] stated that he had no reason to question BROWN's associates, reputation, or loyalty to the United States Government. [ ] added that he would highly recommend BROWN for a position of trust with the United States Government.

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[ ] concluded by stating that due to his position at the firm, he does not have firsthand knowledge of how any clients are ever brought to the firm by the lawyers, and therefore, he would not be able to make any comments regarding BROWN's clients with the company.

[ ]  
PATTON, BOGGS AND BLOW  
2550 M Street, Northwest  
Washington, D.C.

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On December 31, 1992, [ ] Social Security Account Number (SSAN): [ ] advised that he is a partner in the firm of PATTON, BOGGS AND BLOW. [ ] advised that RONALD BROWN is also a partner, however, BROWN has not been that active in the firm since the summer of 1988.

[ ] stated that since BROWN became Chairman of the Democratic National Committee that BROWN only comes into the office on a very periodic basis. [ ] explained that BROWN usually shows up for the partners' meetings which are once every three weeks, and other than that, he usually is not around the office. [ ] stated that at the partners' meetings BROWN is in attendance, however, usually does not partake in the meetings.

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[ ] stated that he is not present at any of the times that BROWN has approached any new clients over the last several years, and therefore, could not make any comments regarding how these clients are obtained for the firm.

[ ] elaborated that any comments he would make regarding BROWN getting new clients for the company would strictly be speculation and would be unfair to BROWN. [ ] stated, however, that he does feel that there would be nothing of a conflict of interest regarding BROWN, PATTON, BOGGS AND BLOW, nor the Democratic National Committee.

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[ ] stated that he would describe BROWN as being a very good negotiator and the type of individual who in [ ]'s opinion has a very good bedside manner with the clients. [ ] stated that he knows of nothing derogatory about BROWN, nor has he ever heard of anything derogatory about BROWN.

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[ ] stated that his association with BROWN is mainly on a professional basis, however, he has had some social contact with BROWN. An example of the social contact would be that several years ago [ ] was trying a case in [ ] and BROWN traveled to [ ] at his own expense to show support with [ ] and while in [ ] they did do some socializing together. [ ] also explained that BROWN every year has a Christmas party at his home, and that [ ] usually does attend that party. [ ] stated that he knows of nothing derogatory regarding BROWN on a social basis.

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[ ] stated he has no knowledge BROWN ever used or sold illicit drugs, or abused prescription drugs or alcohol. [ ] stated he has no knowledge of any type of bias whatsoever on the part of BROWN, and that he has no knowledge of any complaints ever being filed against BROWN.

[ ] stated he has no reason to question BROWN's character, associates, reputation, or loyalty to the United States Government. [ ] added that he felt BROWN was a very intelligent individual, a very fair individual, and a very honest individual. [ ] had no knowledge of any physical problems with BROWN, and as a matter of fact stated that BROWN is a very good basketball player. [ ] stated that he would not hesitate at all in recommending BROWN for a position of trust with the United States Government.

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[ ] reiterated that he would not be able to comment regarding BROWN's recruiting of any new clients for the company, simply due to the fact that he was not present at any of BROWN's recruiting.

[ ]  
PATTON, BOGGS AND BLOW  
2550 M Street, Northwest  
Washington, D.C.

On December 31, 1992, [ ] Social Security Account Number (SSAN): [ ] advised that he has known RONALD BROWN since [ ] stated that he first met BROWN [ ] before BROWN came to work at PATTON, BOGGS AND BLOW. [ ] explained that BROWN came to the law firm for an interview [ ] before he was hired and at that time [ ] met BROWN. Since 1981, [ ] stated that he and BROWN originally worked very closely together, but over the last couple of years, due to BROWN's chairmanship at the Democratic National Committee, they have not worked that closely [ ] also advised that he had become a very close social friend with BROWN over the last [ ] years.

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Additionally [ ] described BROWN as being a very hardworking individual, who is very good at negotiating and getting people to compromise. [ ] stated that he would describe BROWN as a diplomat. [ ] added that he felt BROWN was a very honest individual, and that he was a very dedicated individual.

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BROWN, according to [ ] is a team oriented type of individual who has always worked very diligently on whatever project he was working on. [ ] stated that BROWN, to the best of his knowledge, has never had any participation with the law firm which could possibly present a conflict of interest. [ ] stated that he mainly deals in conflict of interest and he feels he is an expert in the field. [ ] stated that he has not been present at any of BROWN's recruiting of new clients, and therefore, could not state for a fact that there has been any conflict of interest. BROWN, according to [ ] formerly did have Japanese clients, however [ ] stated that these individuals were not from the Japanese government, but were firms in Japan. [ ] stated that as Secretary of Commerce, this could possibly present a problem with some individuals, however, he felt that BROWN would be very loyal to the United States Government, and would not allow his former association with these Japanese firms to cause a loyalty to the Japanese government.

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[ ] stated that he does not feel that any concession deal regarding the 1992 Democratic National Convention in New York City was ever made by BROWN. [ ] stated that to the contrary, due to the enormous success of the Democratic National Convention in New York City, is a demonstration of what a fine decision was made by BROWN. [ ] quickly pointed out that it should be noted that even though BROWN was the Democratic National Committee Chairman, the decision to have the convention in New York was not strictly BROWN's. [ ] stated once again that he feels absolutely no deal was made or any concession made on the part of BROWN regarding the location of the convention.

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Regarding Chemfix [ ] stated that the firm formerly had dealings with the company, but he could not make any comment regarding BROWN's participation in the firm or with the dealings with Chemfix. [ ] stated that he simply did not have that knowledge available to him, and therefore, could not make any comments regarding it. Once again [ ] stated that he does not believe that BROWN would ever participate in any type of conflict of interest, professionally or socially, and spoke very highly of BROWN's honesty and integrity.

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[ ] stated that when he and BROWN first began at the law firm, they shared the same secretary for about six months, and due to that they became very close friends. [ ] described BROWN as being a very competitive individual, who is very dedicated, trustworthy, honest and dependable. [ ] stated that he knows of nothing derogatory about BROWN and throughout the legal profession BROWN is held in high esteem. [ ] has no knowledge of BROWN ever using or selling illicit drugs, or abusing prescription drugs or alcohol. [ ] stated that BROWN is in excellent physical condition and that he, [ ] knows of no problems medically regarding BROWN. [ ] stated that he had no reason to question BROWN's character, associates, reputation, or loyalty to the United States Government. [ ] stated that he would without hesitation highly recommend BROWN for a position of trust with the United States Government.

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[ ]  
PATTON, BOGGS AND BLOW  
2550 M Street, Northwest  
Washington, D.C.

On December 31, 1992, [ ] Social Security Account Number (SSAN): [ ] advised that he is a partner in the law firm of PATTON, BOGGS AND BLOW.

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[ ] advised that he has known RONALD BROWN since BROWN came to the law firm in 1981. [ ] stated that he has been at social gatherings where BROWN has been in attendance, but they are strictly firm related. [ ] stated that his association with BROWN is mainly professional.

[ ] stated that he would describe BROWN as being a very intelligent individual who has the ability to get along well with almost everybody, and appears to be a very good negotiator/promoter. [ ] stated that he has never been at a client pitch of BROWN's, and therefore, would not have any knowledge of how BROWN has secured clients for the firm. [ ] stated that he does not believe that BROWN has ever had any conflict of interest regarding the law firm and his other activities such as Democratic National Committee Chairman, but in view of the fact that he has never been at any of the client pitches, he cannot say for certain. [ ] stated that he felt that BROWN was well respected within the legal community, and that he was a very honest and trustworthy individual.

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[redacted] stated that he has no knowledge regarding BROWN using or selling illicit drugs, or abusing alcohol or prescription drugs. [redacted] stated that he felt BROWN was in very good physical condition, and was emotionally and financially stable. [redacted] stated that he has no reason to question BROWN's character, associates, reputation, or loyalty to the United States Government. [redacted] added that he would recommend BROWN for a position of trust with the United States Government.

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[redacted] stated that he has very little contact with BROWN at the law firm, and that since BROWN has been Democratic National Committee Chairman, he has only been coming to partnership meetings, which are once every three weeks, and does not come into the firm on a regular basis. [redacted] stated that due to this very limited association with BROWN, he has very little knowledge regarding BROWN's activities dealing with any type of foreign clients or any type of recruitment of clients for the firm. [redacted] concluded by stating that he basically could comment regarding BROWN's integrity, but really did not have any other knowledge regarding BROWN's professional activities.

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EMPLOYMENT

PATTON, BOGGS, and BLOW  
2550 M Street, Northwest  
Washington, D.C.  
July 1, 1981 - Present

The following investigation was conducted by Special Agent (SA) [redacted] on January 4, 1993, regarding the appointee, RONALD HARMAN BROWN:

[redacted] for the above-mentioned Law Firm, advised that the partnership records indicate that the appointee was accepted laterally as a Partner with the Firm, commencing July 1, 1981. He further advised that the appointee is still on the books of the Firm as a partner. [redacted] refused to give out any other information regarding the appointee.

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[redacted] advised he has known the appointee both professionally and socially for the past [redacted]. He stated he and the appointee met while they were [redacted]. He described the appointee as a very competent attorney whom he has always known to be very knowledgeable in legal matters. He further advised that the appointee is a good friend who is loyal, fair, honest, trustworthy, and reliable. He further stated that the appointee appears to have a stable personality and to live within his financial means. He commented favorably regarding the appointee's character, associates, reputation, and loyalty to the country and knows of no derogatory information regarding him. He advised he has never seen any indication of prescription drug or alcohol abuse by the appointee, nor is he aware of any involvement with illegal drugs. He further stated the appointee has never expressed or manifested any bias or prejudice against any individual or group based on sex, race, color, religion, national origin, handicap, or age.

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[redacted] advised that to his knowledge the appointee has never abused his position as the Democratic National Chairperson in order to lobby for new business for the Law Firm. He further stated that as far as he knows the appointee has gone out of his way to make sure that there are no conflicts of interest between his chairmanship as the Democratic National Chairperson and the business of being a lawyer. He did note,

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however, that to the best of his knowledge, there are no restrictions placed on the Chairperson regarding enhancing one's outside business. He noted also that in regard to this area the appointee has always kept himself at "arm's length."

[redacted] advised that he is not knowledgeable regarding the appointee's involvement as a registered foreign agent representing foreign governments and companies for the firm, the bond council issue for the District of Columbia Government, the appointee's involvement with Chemfix, and knows that the appointee holds a position with Capital/PEDSCO, however, the appointee has never involved the Firm in this matter.

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With regard to whether or not he had any information regarding the appointee's involvement in a concession deal between [redacted]

[redacted] advised that he knows there was an approach made by someone, however, the deal never happened. He stated he could not recall who made the approach or any of the specifics about the purported deal.

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[redacted] stated that he and the appointee have had several clients in common, as well as [redacted] has taken over some of the appointee's clients while he has been the Democratic National Chairperson, and that the appointee has either been unavailable because of his duties as National Chairperson or did not feel it would be appropriate for him to discuss or work on a client due to his position. [redacted] stated that the appointee is very cognizant of the responsibilities of the National Chairperson, and that for the past four years he has placed them above the Firm's needs.

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[redacted] advised that she has known the appointee on a professional basis since she joined the Firm in [redacted]

[redacted] She further stated that she has found the appointee to be a terrific attorney who is smart, suave, and very talented. She noted that the appointee has asked her in the past to handle clients which he has brought to the Firm because of her expertise in [redacted]

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[redacted] stated that the appointee has not abused his position as the Democratic National Chairperson to lobby to enhance the business of the Law Firm. She stated he is a very prominent attorney in and around the Washington scene, and that any allegations in this regard are "complete garbage." She

stated that he has been very up-front with both the Democratic National Committee and the Law Firm in all his dealings.

She further stated that she has no knowledge of the appointee's involvement with being a registered foreign agent representing foreign governments or any companies. She further advised that she knows of no improprieties with the Firm being awarded the bond councilship to the District of Columbia Government. She stated that to her knowledge, the appointee advised partners of the Firm that there was a bond issue, and that they (the bond specialists in the Firm) prepared a bid which was presented to the District of Columbia Government and the Firm won the bid based on the merits of the bid. [REDACTED]

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[REDACTED] She stated that the extent of involvement by the appointee is strictly through professional courtesy, in which she advises him in general about his clients. She stated that to the best of her knowledge, the appointee has had no contact to represent the client since he has taken over as Democratic National Chairperson. She further stated that is not to say that he has not had some sort of professional/social contact with the client.

She stated she has no knowledge that a confession deal between the appointee and [REDACTED] during the Democratic National Convention. She stated further that she has no knowledge of the appointee's involvement with Chemfix, but believes that they may be a client.

[REDACTED] stated that she has never heard of the Capital/PEDSCO until she read something recently in the newspapers regarding it. [REDACTED] stated that she knows the appointee is very conscious about any conflicts of interest between his duties as Democratic National Chairperson and his law practice. She further stated that he goes out of his way to make sure that all his dealings are above-board.

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[REDACTED] then described the appointee as a good person whom she has always known to be honest, trustworthy, and reliable. She further stated that he is a very devoted family man. She continued that as far as she knows the appointee has no questionable associates and is of good character. She knows of no prescription drug or alcohol abuse, nor any involvement with illegal drugs. The appointee is considered to be living within his financial means and seems to be healthy, both mentally and physically. She further stated that the appointee has never

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expressed or manifested any bias or prejudice against any individual or group based on sex, race, color, religion, national origin, handicap, or age. She concluded by stating she believes the appointee to be loyal to the United States Government and that he would be an asset to the United States Government, and that she would recommend him highly for a position of trust and confidence with the Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

On December 29, 1993, [redacted] Democratic National Committee (DNC), 430 South Capitol Street, Southeast, Washington, D.C., was interviewed by Special Agent (SA) [redacted] regarding the appointee, RONALD H. BROWN. After being apprised of the official identity of the interviewing SA and the nature of the interview, [redacted] provided the following information:

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[redacted] advised that she has known the appointee since 1980 on a professional basis. [redacted] stated that both she and the appointee formerly worked for the Kennedy for President Campaign in 1980, and that is where they initially met. [redacted]

[redacted] advised that she could substantiate that the appointee was formerly employed as the Deputy National Campaign Manager at the Kennedy for President Campaign from approximately November, 1979 until August, 1980.

[redacted] advised that as the DNC Chairman, the appointee has been very effective at reaching out to all of the elements of the Democratic Party, unifying it and helping to elect a Democratic president. [redacted] considered the appointee to be a good manager.

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[redacted] advised that she was not personally aware of the appointee ever referring any type of business or clientele to his law firm, PATTON, BOGGS, and BLOW. However, [redacted] was aware that the appointee has maintained several clients since coming to DNC, one of which was the City of Denver. [redacted] advised that the appointee performed some legal work, particularly right after he became DNC Chairman, inasmuch as he wanted to finish the legal work that he had already started.

[redacted] advised that although the appointee has had foreign clients, she believed the appointee would place American interests before any interests of his foreign clients. As an example, [redacted] stated that the appointee opposed the North American Free Trade Agreement (NAFTA), however, the NAFTA was

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Investigation on 12/29/92 at Washington, D.C. File # WMFO 161A-HQ-1042752

by SA [redacted] :gf Date dictated 1/3/93

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Continuation of FD-302 of [REDACTED]

, On 12/29/92 , Page 2

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supported by then presidential candidate BILL CLINTON and a majority of the Democrats in the House of Representatives. [REDACTED] advised that if one was to assume that the appointee was representing the interests of a foreign client, the appointee would have favored the NAFTA.

With respect to allegations that appointee has lobbied Capitol Hill in behalf of his law firm while at DNC, [REDACTED] advised that the appointee opposed the MOYNIHAN Reduction Social Security tax, which proposed a reduction in the Social Security tax. [REDACTED] stated that the majority of Democrats on the Hill took a position to support the reduction, however, the appointee and the DNC were against the reduction. In addition, the appointee has spent some time lobbying Capitol Hill for Campaign Finance Reform. [REDACTED] advised that the NAFTA, the MOYNIHAN Reduction Social Security tax and Campaign Finance Reform were three examples where the appointee lobbied Capitol Hill on behalf of the DNC. To [REDACTED] knowledge the appointee has never lobbied on behalf of law firm clients since assuming Chairmanship at DNC.

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[REDACTED] advised that there have been several allegations raised in the press about the appointee, over the last couple of years, involving cronyism, potential conflict of interest with respect to his business ties and affiliations. [REDACTED] further advised that the FEDERAL BUREAU OF INVESTIGATION (FBI) could get an overall view of these allegations by a recent report published by the Center for Public Integrity in Washington, D.C. [REDACTED] advised that she would arrange to furnish a copy of this report to the FBI by facsimile.

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[REDACTED] advised that it has been published and rumored that the Republicans on Capitol Hill want to politically embarrass President-Elect CLINTON and the appointee during his Confirmation Hearings by bringing out that he represented foreign interests over American interests with respect to his law firm practice. [REDACTED] noted that the Republicans want to make an issue out of the fact that President-Elect CLINTON maintained throughout his campaign and since the election that he wanted to select a Cabinet by very strict ethical standards, and that his appointees would be individuals who put American interests ahead of foreign interests.

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Continuation of FD-302 of [redacted], On 12/29/92, Page 3

[redacted] described the appointee as a very outgoing individual who is easy to work with and not status conscious. She noted that he is a diplomatic individual who is very genuine, honest, and trustworthy. [redacted] was not aware of any derogatory or adverse information regarding the appointee's character, associates, reputation, or loyalty to the United States Government. She considers the appointee to be emotionally stable and financially secure. [redacted] was not aware of any illicit drug use or abuse of alcohol by the appointee. She had no reason to believe the appointee would pose any type of security risk to the United States Government. [redacted] was not aware of any racial bias or prejudice on the part of the appointee. [redacted] concluded by recommending the appointee for a position of trust and confidence within the United States Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/31/92

WMFO T-1, who requested that his identity be protected from anyone outside the FEDERAL BUREAU OF INVESTIGATION (FBI), advised that he has known RONALD H. BROWN [REDACTED]

[REDACTED] In this document, the source of this information, WMFO T-1, will be referred to for convenience as "the source" or as "he". No inference should be drawn as to the sex of this individual because of this usage.

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WMFO T-1 described RONALD BROWN as "a tremendous leader" and stated that he has always been fair and ethical in his professional dealings. He particularly admired the [REDACTED]

[REDACTED] As a leader and manager, the appointee empowered people, a very important and positive trait, in the source's opinion. In speaking of the appointee more personally, the source described him as very personable and stated that he was always impressed that the appointee took time for his family and was able to take time to spend with friends as well. The source summarized this quality on the appointee's part as BROWN's being very balanced.

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The source has not become aware of anything which he feels reflects adversely on the appointee. He has never seen any instances of alcohol abuse, or illegal drug use, or of prescription drug abuse on his part. He has never questioned the appointee's loyalty to this country, and believes BROWN to be very discreet in his handling of sensitive or classified information. He has never known any instances of prejudice on the appointee's part. In the years he has known BROWN, the source has never seen any indication that BROWN is living beyond his personal finances. Based on their association in the past, the source would recommend RONALD BROWN for a position of responsibility and trust with the United States Government.

Investigation on 12/31/92 at Washington, D.C. File # WMFO 161A-HQ-1042752

by SA [REDACTED] meh Date dictated 12/31/92

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RPC:meh

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The following investigation was conducted by Special Agent (SA [redacted]) on December 31, 1992, regarding the appointee, RONALD HARMON BROWN:

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[redacted] Democratic National Committee (DNC), Washington, D.C., telephone number [redacted] advised that she has known RONALD BROWN on a professional basis for about [redacted] having worked for him at the Democratic National Committee. In speaking of the appointee's professional ability and professional reputation, [redacted] described the appointee as "a star". She further described him as a very talented and capable individual, one who is excellent in working with various groups of people. She stated that she has had some social contact with him as well and is not aware of anything which reflects adversely on him. She has never seen any indication of alcohol abuse, of illegal drug use, or of prescription drug abuse on his part. She has no question about his loyalty to this country and believes him to be very discreet in his handling of sensitive or classified information. She has not seen any signs of prejudice on his part toward any individual or group. [redacted] stated that she cannot speak about the appointee's personal finances because she does not have sufficient knowledge of him in this regard. [redacted] advised that she would recommend RONALD BROWN for a position of confidence and trust with the United States Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

[redacted]  
[redacted] advised that she has known RONALD BROWN since [redacted]  
When she first met BROWN, BROWN was the Chairman of the Task  
Force of the Democratic National Committee (DNC) and [redacted] was  
[redacted] stated that she  
recently served as [redacted]  
[redacted]

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[redacted] stated that she has known the appointee on  
both a professional and a personal basis over the years. She  
summarized her feelings of the appointee by describing him as  
"absolutely wonderful". In speaking of him professionally, she  
stated that he is a great person to work for, since he is very  
free and open to listen to the staff who work around him. He is  
the kind of leader who is not uncomfortable having a strong  
staff. BROWN is a consensus builder and works through  
compromise. [redacted] stated that all of her comments concerning  
BROWN professionally are favorable. Her comments concerning  
BROWN personally reveal that [redacted] thinks highly of him. She  
described him as a very sensitive and considerate individual and  
she recalls having placed a great deal of personally sensitive  
information at the appointee's disposal. She never knew him to  
improperly handle this information and has a great deal of trust  
in his judgement and discretion. She never saw any indication  
the appointee abuses alcohol, uses illegal drugs, or abuses  
prescription drugs. She has no question about his loyalty to  
this country. She has never known him to show any signs of  
prejudice toward any individual or group and stated that all  
indications are that the appointee does live within his financial  
means. [redacted] stated that she would recommend RONALD BROWN for  
a position of confidence and trust.

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[redacted] was asked to comment on an allegation in the  
press that a personal friend of BROWN's [redacted] was about  
to receive a contract for the sale of goods and souvenirs at the  
1992 Democratic National Convention. The allegation states that

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Investigation on 1/4/93 at Washington, D.C. File # WMFO 161A-HQ-1042752

by SA [redacted] :meh Date dictated 1/4/93

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Continuation of FD-302 of [REDACTED], On 1/4/93, Page 2

plans to grant him this contract were dropped when news reports surfaced about BROWN's personal and business relationship with [REDACTED]. [REDACTED] stated that in her position [REDACTED] to the Democratic National Convention, part of her responsibility was to [REDACTED].

[REDACTED] She recalled that [REDACTED] approached Chairman BROWN about the possibility of being awarded the concession to sell souvenirs and other goods at the 1992 Democratic National Convention.

[REDACTED] stated that she and the staff of the Convention looked at [REDACTED] proposal, taking into consideration his firm and its experience. She stated that she and the staff recommended that [REDACTED] firm not be granted this right to the concession, believing that his firm was not well suited for this job. She advised that the job of selling souvenirs and other goods at the Convention is a very difficult job, one with many unforeseen difficulties. [REDACTED] advised that the staff believed that it was necessary to "go with the most experienced", leading them to believe that another firm should be granted the rights to this concession and not [REDACTED] firm. [REDACTED] advised that Chairman BROWN concurred in this decision.

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In response to the hypothetical question by the interviewing agent, [REDACTED] stated that it would have been perfectly proper from a legal and technical standpoint to grant a contract to [REDACTED] if his firm had been best qualified to carry out this contract. She stated that [REDACTED] prior friendship or business relationship with Chairman BROWN would not have been a negative factor from a legal and technical standpoint. She did advise, however, that this relationship would certainly have been considered from a political standpoint.

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DEMOCRATIC NATIONAL CONVENTION

Washington, D.C.

The following investigation was conducted by Special Agent (SA) [redacted] on December 31, 1992, regarding the appointee, RONALD H. BROWN:

[redacted]  
Democratic National Convention, advised that she has known RONALD H. BROWN on a professional basis since [redacted]

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[redacted] She had met him sometime before that as well. In speaking of the appointee's professional ability and professional reputation, [redacted] described BROWN as "terrific". She stated that he "pulled the party back together". She described BROWN as an individual who listens well, reaches out to people and was well liked by the staff. [redacted] considers BROWN to be "one of the best people I have ever worked for".

[redacted] advised that she does not know BROWN on a social basis, but has been to his home on several occasions for various parties. She is not aware of anything which reflects adversely on him. She has not seen any indication of alcohol abuse, of illegal drug use, or of prescription drug abuse on his part. She believes that he is a loyal American, and has always known him to be very careful and discreet in handling sensitive information.

[redacted] advised that she has not seen any signs of prejudice on the appointee's part toward any racial, religious, or ethnic group. In fact, she noted that the Democratic National Committee under the Chairmanship of the appointee, is a very diverse group, consisting of gays as well as a wide variety of other people.

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[redacted] stated that she has not seen any information indicating the appointee is living beyond his financial means, but does not know him well in that regard.

In speaking about the appointee's ability to judge a question fairly and come to a decision as an employee of the United States Government [redacted] stated that she is reminded of the time when BROWN first came to the Democratic National Committee. He came to the Committee with a background of having worked for Senator KENNEDY and also having been involved in the Presidential Campaign of JESSE JACKSON. These facts led some people at the Democratic National Committee to believe that BROWN was "in the pocket" of one group or another. In [redacted] opinion, BROWN has proven all of these people wrong. She believes that he listened to a wide variety of people and he develops trust in

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those with whom he has had negotiations or dealings. She stated that he has dealt fairly with all of the diverse interests within the Democratic Party and she believes that he will be equally fair and impartial in dealing with those with whom he has contact as an official of the United States Government. In commenting on the appointee's ability to properly make decisions and consider a wide variety of sides of an issue [redacted] stated that the appointee has "proved quite competent in this regard". [redacted] stated that she is pleased to recommend BROWN for a position of confidence and trust with the United States Government.

[redacted] was asked to comment on reports in the newspapers that [redacted] a long time friend of the appointee's, had been awarded a contract to sell goods at the 1992 Democratic Convention, but that this contract was withdrawn when news reports surfaced of the relationship between [redacted] and BROWN. [redacted] stated that she recalls one newspaper story on this subject some time ago, but has absolutely no information about this matter. [redacted] explained that the Democratic National Convention has a separate Board of Directors, and separate officers from the Democratic National Committee. The Democratic Convention has its own Chief Executive Officer and its work was very much separate from the work of the Committee. [redacted] suggested that former officials of the Convention be interviewed concerning this matter as they would be more knowledgeable than members of the Democratic National Committee staff.

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WMFO 161A-HQ-1042752

JPW:jpw

EMPLOYMENT

Disbursing Office  
United States Senate  
Washington, D.C.

The following investigation was conducted by SA [redacted]  
[redacted] regarding the appointee, RONALD HARMON BROWN:

On 12/28/92, [redacted] Supervisor, advised that  
his records indicate the appointee was employed as follows:

From 9/12/80 to 12/11/80, on a daily basis, as the  
Chief Counsel, U.S. Senate Committee on the Judiciary; from  
12/12/80 to 4/30/81, on an annual basis, as the Chief Counsel,  
U.S. Senate Committee on the Judiciary, until 1/21/81, and from  
2/1/81 until 4/30/81, as the General Counsel and Staff Director,  
Office of Senator EDWARD KENNEDY.

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[redacted] advised no derogatory information is located in  
the Personnel Computer System.

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EMPLOYMENT

U.S. Senate Committee on the Judiciary  
DIRKSEN Senate Office Building  
Washington, D.C.  
8/80 - 1/81

The following investigation was conducted by SA [redacted]  
[redacted] regarding the appointee, RONALD HARMON BROWN:

On 12/28 and 12/30/92, [redacted] advised all other members of the staff are on leave and will not return until 1/4/93. He noted that the only person still on the staff who would have known the appointee in [redacted] is [redacted]. He said he would attempt to locate [redacted] and have him contact SA [redacted] as soon as possible regarding the appointee.

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On 12/31/92, [redacted] telephonically contacted SA [redacted] from his home in Maryland, [redacted]. He advised he has known the appointee professionally since [redacted] when the appointee became the General Counsel of the Senate Committee on the Judiciary. He stated he worked for the appointee and others as part of the support staff. He described the appointee as a good leader, one who let his subordinates do their jobs. He stated the appointee was very knowledgeable, intelligent, and although he was only in the job for a short time, the appointee was able to grasp exactly what was required of him and was able to get the job done. He noted the appointee had an easy transition into his job and did not cause any problems for the staff. He said the appointee is very friendly, very easy going, professional and highly respected by all that knew him. He stated he never heard any complaints or derogatory information concerning the appointee.

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[redacted] advised he is the only person still on the staff of the committee that was present there in [redacted]. He noted that any personnel records of that period that may have been compiled by the committee have most likely been destroyed, if, in fact, any were maintained. He stated there is no reason to maintain them after a person has left the staff. The only personnel records required are maintained by the Disbursing Office.

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On 1/4/93, [redacted] Subcommittee on Immigration and Refugee Affairs, [redacted] advised he works for Senator KENNEDY and has known the appointee professionally and socially since [redacted] when the appointee was Chief Counsel of the Judiciary Committee. He said



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the appointee is highly regarded as a person of integrity and capability. He said the appointee is very easy to work with, articulate and intelligent. He advised the appointee is a consensus builder and uses his staff accordingly. He noted that the appointee at one time represented the Government of Haiti regarding immigration matters. [ ] said the appointee did this job properly and to his knowledge, there was no conflict of interest. He advised he does not know any derogatory information regarding the appointee and holds him in highest esteem. He stated the appointee only stayed on the Judiciary Committee for a short time because the Democratic Party lost the election that year.

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[ ] and [ ] commented very favorably regarding the character, associates, reputation and loyalty of the appointee. Both have no knowledge of any abuse of alcohol or prescription drugs or use of illegal drugs by the appointee. Each is unaware of any financial, emotional or physical problems on the part of the appointee. Each stated they have no indication the appointee has any bias or prejudice against any individual or group. Both believe the appointee is suitable for access to classified information. Both highly recommended the appointee for a position of trust and confidence with the United States Government.

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Senate Judiciary Committee  
United States Senate  
Washington, D.C.

The following investigation was conducted by Special Agent [ ] on January 4, 1993, concerning the appointee, RONALD HARMON BROWN:

[ ] for the Judiciary Committee, stated there was no ethics problem in having a staff member leave the Committee to join a law firm, taking clients he may have met while serving with the Committee.

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[ ] continued that the only prohibition of a former staff member is that he cannot testify, for any reason, before the Committee within one year of departure.

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EMPLOYMENT

Office of Senator EDWARD KENNEDY  
RUSSELL Senate Office Building  
Washington, D.C  
1/81 - 7/81

The following investigation was conducted by SA [ ]  
[ ] regarding the appointee, RONALD HARMON BROWN:

On 12/29/92, [ ]  
[ ] advised that the entire office staff is on leave and will  
return to work on 1/4/93. She advised she would attempt to  
locate the following persons who are knowledgeable regarding the  
appointee in 1981 and have them contact SA [ ] She noted  
[ ] and [ ] are on leave at home. She stated  
[ ]  
[ ] works for Senator KENNEDY. He is currently on vacation  
in Puerto Rico and will return on 1/4/93. She advised [ ]  
[ ] for Senator KENNEDY, [ ]  
is on leave in Wales and will return on 1/4/93. She also advised  
that Senator KENNEDY is in Massachusetts and will contact SA  
[ ] by 1/4/93.

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[ ] further advised that her office does not maintain  
any personnel records for employees that date back to 1981. She  
noted the appointee was the General Counsel and Staff Director  
for Senator KENNEDY from approximately 1/81 through 4/81.

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On 12/30/92, [ ]  
[ ] advised  
she works for Senator KENNEDY and has known the appointee  
professionally since 1980 when she worked with him on the KENNEDY  
Presidential Campaign. She noted the appointee was the General  
Counsel and Staff Director for Senator KENNEDY for a short period  
in early 1981. She described the appointee as a very honest,  
gracious man of integrity who is nice to work with, congenial and  
admired and respected by those who know him. She stated he is a  
very hard worker and puts in long hours. She noted he is highly  
respected by Senator KENNEDY. She advised she has maintained her  
professional contacts with the appointee over the years. She  
stated she has never heard of any derogatory information  
regarding the appointee.

On 12/30/92, [ ]  
for Senator KENNEDY, [ ] advised she has known the  
appointee professionally through Senator KENNEDY's office and  
socially at various staff parties and functions since 1980. She  
indicated the appointee acted as Senator KENNEDY's General

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Counsel and Staff Director for about five months in early 1981. She said the appointee is a man of great accomplishments and ability, who is gifted at diplomacy, is a leader and is held in great esteem by his colleagues. She stated he is personable, has a good sense of humor, is a man of integrity, is trustworthy and gets the job done. She advised he is very likeable, builds consensus before he acts, and to her knowledge, has never betrayed his trust. He indicated she has never heard anything adverse regarding the appointee and noted the appointee, in her estimation, is an "outstanding choice".

On 1/3/93, Senator EDWARD KENNEDY, (202) 224-4483, telephonically advised he has known the appointee professionally and socially since 1979 when the appointee joined his Presidential Campaign. He said the appointee is a "first rate person of high personal integrity", with outstanding personal character traits. He stated he does not regard as a problem any of the appointee's lobbying efforts or acts relating to foreign agent registration matters as discussed in the public media. He noted the appointee will respond to these matters accordingly to the complete satisfaction of the Senate. He said the appointee has built an excellent reputation that will not be sullied by accusations. He advised if any matters concerning the appointee would adversely reflect upon President-Elect CLINTON, the appointee would not go forward with the confirmation process. KENNEDY reiterated that he believes the appointee is a man of high personal integrity and will face any allegation or charge. KENNEDY stated he knew of no adverse information regarding the appointee.

On 1/4/93, [REDACTED] for Senator KENNEDY, [REDACTED] advised he has known the appointee professionally since 1979 when the appointee joined the KENNEDY Presidential Campaign. He stated they both worked closely together for about 8 to 10 months in 1980 during the campaign. He said he later worked with the appointee in Senator KENNEDY's office when the appointee was the General Counsel and Staff Director from about January, 1981 until May or June, 1981. He said the appointee left KENNEDY's staff and returned to his law firm. He described the appointee as a person of outstanding ability with excellent credentials, knowledge and reputation. He said the appointee did an outstanding job, was an extraordinary negotiator and brought many people of various political minds together. He stated the appointee is a very talented person, very gregarious and well liked and respected by colleagues, staff members and the leaders in Congress. He said he never heard any adverse or derogatory information regarding the appointee. He noted that because of the way the appointee conducts himself and does business, in a very public and above board manner, he would

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be amazed if the appointee was involved in any conflicts of interest.

All of the above individuals commented favorably regarding the character, associates, reputation and loyalty of the appointee. Each advised they have no knowledge of any abuse of alcohol or prescription drugs or use of illegal drugs by the appointee. Each is unaware of any financial, emotional or physical problems on the part of the appointee. All stated they have no indication the appointee has any bias or prejudice against any group or individual. Each believes the appointee is suitable for access to classified information. All of the above highly recommended the appointee for a position of trust and confidence with the United States Government.

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EMPLOYMENT

National Urban League  
1111 14th Street, N.W.  
Washington, D.C.  
9/73 - 11/79

The following investigation was conducted by SA [ ]  
[ ] regarding the appointee, RONALD HARMON BROWN:

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On 12/30/92, [ ] Policy and Government Relations, [ ] advised he has known the appointee professionally and socially since [ ] when the appointee hired him at the National Urban League, Washington, D.C. He described the appointee as a gentleman who is highly competent, intelligent, compassionate, very personable with staff members and acquaintances, trustworthy, sincere and friendly. He stated the appointee is a hard worker whose product is of the highest quality and very accurate. He said the appointee is a man of great integrity and has never been known to misrepresent himself. He noted the appointee has been very active in civil rights matters. [ ] said he would recommend the appointee "without reservation".

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On 12/30/92, [ ] Legislative Assistant, [ ] advised the Washington, D.C., office of the National Urban League does not maintain any personnel records. All records are maintained by the National Urban League Corporate Headquarters, 500 E. 62nd Street, New York City, New York, (2120 310-9000.

On 12/30/92, [ ] Washington Urban League, 3501 14th Street, N.W., Washington, D.C., [ ] advised she has known the appointee professionally and socially since [ ] when she was hired and worked for the appointee, who at the time was the Director of the Washington Bureau of the National Urban League. She stated she was the [ ] during the period of [ ] and worked directly for the appointee. When he left the National Urban League, she said she was promoted to the position of [ ] based on his recommendations. She stated he was a great person to work for and was always encouraging and supporting his staff. She noted he exhibited excellent leadership skills, delegated authority and surrounded himself with experts and good people who could get the job done. She described him as an outstanding individual with excellent work ethics and a good reputation. She noted he is a great family man. She said she has never heard anything adverse

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regarding him and would "absolutely recommend him without reservation".

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On 12/30/92, inquiry at the National Urban League, 500 East 62nd Street, New York City, New York, (212) 310-9010, disclosed that [redacted] was on extended vacation. The switchboard operator would attempt to locate [redacted] and have him contact SA [redacted] as soon as possible regarding the appointee.

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On 12/30/92, inquiry at the National Urban League, Washington, D. C., disclosed VERNON JORDAN, a member of the League who is well acquainted with the appointee, is currently on vacation in Florida and will return to the Presidential Transition Office on 1/4/92. His secretary will attempt to contact him and have him contact SA [redacted] as soon as possible regarding the appointee.

On 1/4/93, [redacted] National Urban League, 500 E. 62nd Street, New York City, New York, [redacted] telephonically advised he has known the appointee professionally and socially for at least the last 20 years, mostly through the National Urban League. He said he has followed the appointee's career closely and stays in contact with him. He described the appointee as extremely honest, sensitive, committed, reliable and hard working. He said the appointee is a good leader, a consensus builder and a person who gets the job done. He advised the appointee gets along very well with others and works very hard at making contacts and establishing relationships with persons with whom he conducts business. He said the appointee is very well respected and regarded throughout the country. He noted that there is public interest in his lobbying efforts and his representation of foreign governments. He said this was the appointee's job at the time and he did that job very well. [redacted] stated he is unaware of any conflicts of interest regarding the appointee and has never heard any adverse or derogatory information regarding him.

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[redacted] commented very favorably regarding the character, associates, reputation and loyalty of the appointee. Each stated they have no knowledge of any abuse of alcohol or prescription drugs or use of illegal drugs by the appointee. Each is unaware of any financial, emotional or physical problems on the part of the appointee. Each said they have no indication the appointee has any bias or prejudice against any group or individual. Each believes the appointee is suitable for access to classified information. All of the above highly recommended the appointee for a position of trust and confidence with the United States Government.

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RESIDENCE/NEIGHBORHOOD

2722 Unicorn Lane, Northwest  
Washington, D.C.  
February, 1982, to the present

On December 31, 1992, Special Agent (SA) [redacted]  
FBI, conducted the following neighborhood investigation with regard  
to the appointee, RONALD HARMON BROWN:

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[redacted]  
[redacted]  
[redacted] advised he has known the appointee as a  
neighbor for about one year when he [redacted] moved there in 1991.  
[redacted] advised the appointee has resided at that address for 10 years  
with his wife [redacted]. Appointee has two children, neither residing  
at home. [redacted] stated that the appointee is a good neighbor and  
friend and is a kind and generous person to have for a neighbor.  
[redacted] advised appointee is man of integrity with outstanding  
character, associates, reputation, and loyalty to the United States  
Government. [redacted] knows nothing of a derogatory nature regarding  
the appointee and is unaware of any abuse of alcohol or  
prescription drugs or use of any kind of illegal drugs including  
marijuana. [redacted] is unaware of any biases or prejudices on the part  
of the appointee toward any groups or individuals. Appointee  
appears to be financially stable. Appointee appears to be in  
excellent physical and mental health. [redacted] highly recommended the  
appointee for a position of trust and confidence with the U.S.  
Government.

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[redacted]  
[redacted] advised the appointee has resided [redacted]  
[redacted] at 2722 Unicorn Lane along with his wife since approximately  
February, 1982. [redacted] stated that the appointee has two children,  
neither of whom currently reside at home. [redacted] described the  
appointee as a good neighbor of excellent character, reputation,  
associates, and loyalty to the U.S. Government. [redacted] is unaware  
of anything of a derogatory nature regarding the appointee and does  
not know him to ever have abused alcohol or prescription drugs or  
to have used any type of illegal drugs. [redacted] does not know the  
appointee to be biased or prejudiced toward any group or  
individuals. [redacted] appears to be financially stable and in good  
physical and mental health. [redacted] recommended the appointee for a  
position of trust with the U.S. Government due to his excellent  
standing, trustworthiness, and hard work on the Democratic National  
Committee.

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[redacted]  
[redacted] advised the appointee has resided at the above address with his  
wife since approximately February, 1982. [redacted] commented that the

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appointee also has two grown children who are not currently residing at home. [ ] considers the appointee to be a good neighbor and friend with excellent morals, trustworthiness, integrity, character, associates, reputation, and loyalty to the U.S. Government. [ ] knows nothing of a derogatory nature regarding the appointee and does not know him to abuse alcohol or prescription drugs or to use any type of illegal drugs including marijuana. Appointee is known to be biased or prejudiced toward any groups or individuals and appears to live according to his financial means. [ ] considers the appointee to be of good mental and physical health and highly recommends the appointee for a position of trust and confidence with the U.S. Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

On January 3, 1993, [redacted]  
[redacted] Washington, D.C., was interviewed by  
Special Agent (SA) [redacted] regarding the appointee,  
RONALD H. BROWN. After being advised of the official identity of  
the interviewing SA and the nature of the interview, [redacted] of  
provided the following pertinent information:

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[redacted]  
[redacted] advised that he has known the appointee [redacted]  
years on both a professional and social basis. In that regard,  
[redacted] verified that the appointee currently resides at 2722  
Unicorn Lane, Northwest, Washington, D.C.

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[redacted] described the appointee as a nice man who is easy  
to get along with and whom he considers to be a good friend. He  
had no reason to question either the appointee's honesty or  
trustworthiness. [redacted] was not aware of any derogatory or  
adverse information regarding the appointee's character,  
associates, reputation, or loyalty to the United States  
Government.

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[redacted]  
[redacted] explained to the interviewing SA that he owns and  
operates [redacted]

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Investigation on 1/3/93 at Washington, D.C. File # WMFO 161A-HQ-1042752

by SA [redacted] gf Date dictated 1/3/93

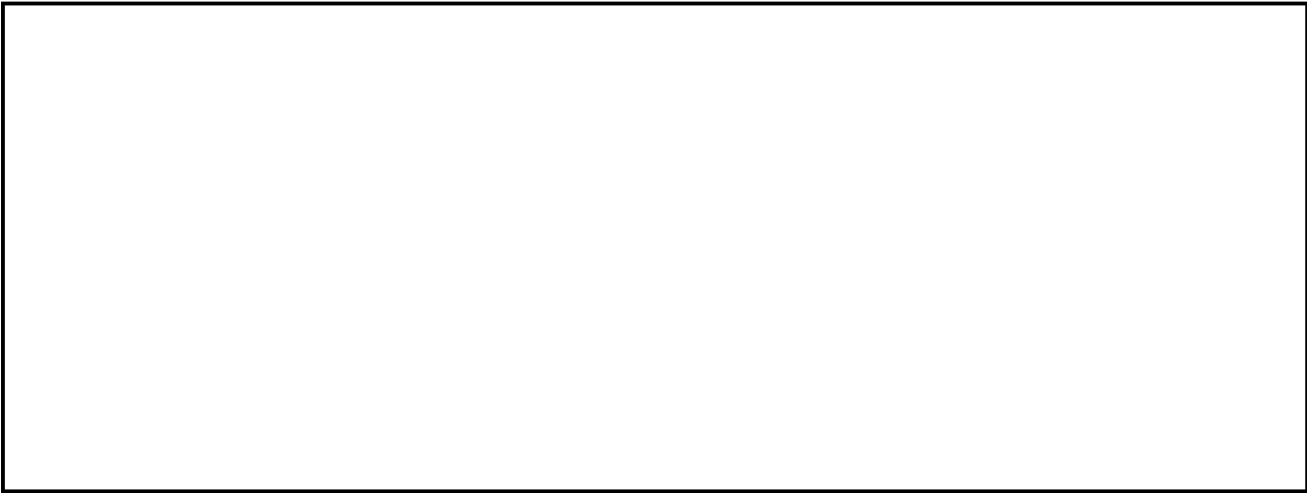
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Continuation of FD-302 of , On 1/3/93, Page 3

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advised that he never discussed with the appointee any District of Columbia government contract that the appointee was involved in, and in fact, he and the appointee always "took pains" to avoid such conversations. Furthermore,  was not aware of any unethical business dealings, cronyism, or conflict of interest on the part of the appointee.

considers the appointee to be emotionally stable and financially secure. He was not aware of any illicit drug use or abuse of alcohol. He had no reason to believe the appointee would pose any type of security risk to the United States Government.  concluded by recommending the appointee for a position of trust and confidence within the United States Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

On January 4, 1993, [redacted]  
[redacted] for the District of Columbia Government, [redacted] 441  
4th Street, Northwest, Washington, D.C., was interviewed by  
Special Agent (SA) [redacted] regarding the background  
investigation of the appointee, RONALD H. BROWN. After being  
apprised of the official identity of the interviewing SA and the  
nature of the inquiry [redacted] provided the following pertinent  
information:

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[redacted] advised that she has known the appointee since  
approximately [redacted] on a professional basis only.

With respect to the Bond Counsel contract, [redacted]  
recalled that the procurement process occurred from approximately  
June through August of 1991, which began with the District of  
Columbia advertising in local newspapers for Bond Counsels to  
submit RFPs, the review of those RFPs by the Selection Committee  
for the District of Columbia Government, and finally, the  
selection of the Bond Counsel.

[redacted] advised that [redacted]  
[redacted] which reviewed  
the RFPs and made Bond Counsel selections. [redacted] further  
advised that the Selection Committee was made up of the Treasurer  
of the District of Columbia Government, the Corporation Counsel,  
and one of his assistants and then Mayor KELLY's Chief of Staff,  
[redacted], who is no longer with the District of Columbia  
Government.

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[redacted] advised that the Law Firm of PATTON, BOGGS,  
and BLOW had some bond experience, particularly in municipal  
bonds.

[redacted] recalled that at least nine to 12 law firms  
applied for the Bond Counsel contract, and an additional eight  
minority firms applied for the contract. [redacted] explained that  
it is ordinary for the District of Columbia Government to issue a  
three-year contract for Bond Counsel. The Bond Counsel contract

Investigation on 1/4/93 at Washington, D.C. File # WMFO 161A-HQ-1042752

by SA [redacted] gf Date dictated 1/4/93

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Continuation of FD-302 of [REDACTED], On 1/4/93, Page 2

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that had been awarded during the MARION BARRY administration expired in June of 1991. [REDACTED] further explained that the amount of time available before a new bond financing began in September of 1991, required the District of Columbia Government to do an emergency procurement to select an Interim Bond Counsel.

With respect to the Interim Bond Counsel, the District of Columbia Government Selection Committee wanted to choose two law firms to perform that work. The Selection Committee was desirous of having both of the law firms originate from Washington, D.C., and having one of the two law firms be a minority firm. In that regard, [REDACTED] recalled that at least nine to 12 majority firms applied, and perhaps eight minority firms applied for the Bond Counsel contract.

[REDACTED] advised that with regard to the expired bond contract that had originated under the BARRY administration, the Selection Committee had the option to extend that contract, but was rejected by the Selection Committee because the new administration wanted to have their own Bond Counsel.

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[REDACTED] advised that one of the prerequisites besides having local and minority firms handle the Bond Counsel contract was to assure that the law firm had sufficient experience and knowledge in the municipal bond area. In addition, the Selection Committee also wanted an assurance that the law firm would be responsive to the KELLY administration. [REDACTED] explained that these conditions knocked out at least two to three of the majority law firm applicants, and approximately three of the minority law firm applicants.

[REDACTED] advised that a series of interviews with representatives of the various law firm applicants took place during the summer of 1991, wherein the applicants made presentations on their own behalf. [REDACTED] recalls the Law Firm of PATTON, BOGGS, and BLOW making a presentation, but could not recall if the appointee was part of that presentation.

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In the end [REDACTED] felt that the appointee's law firm had the most positives and the fewest negatives in its ability to get the bond deal done for the District of Columbia.

After the contract was awarded to PATTON, BOGGS, and BLOW, [REDACTED] and the appointee routinely communicated with one

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Continuation of FD-302 of [redacted], On 1/4/93, Page 3

another so that [redacted] could determine how the bond work was progressing.

[redacted] maintained that she never had any discussions with the appointee about the Bond Counsel contract prior to the completion of the Selection Committee work or process.

[redacted] advised that Mayor SHARON PRATT KELLY has the right of veto in the selection of the Bond Counsel, however, routinely Mayor KELLY follows the recommendation of the Selection Committee. [redacted] stated that she briefs the Mayor regarding the Bond Counsel contract and its selection.

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[redacted] was not aware of any improper conduct by the appointee with respect to the Bond Counsel contract.

[redacted] stated that she did not know the appointee well enough to comment on his qualifications for a high level position in the United States Government. Furthermore, she was not aware of any derogatory or adverse information regarding the appointee's character, associates, reputation, or loyalty to the United States Government. [redacted] was not aware of any illicit drug use or abuse of alcohol by the appointee. [redacted] concluded by stating that she knew of no reason not to recommend the appointee for a position of trust and confidence within the United States Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

VIC FAZIO, United States Representative, United States House of Representatives, Washington, D.C., was questioned as to the contents of any Whip meetings he (FAZIO) attended over the last several years.

FAZIO stated the meetings are orderly and are of an organizational tone, and which grant opportunities to members attending the meetings to express themselves regarding any pending legislation and to establish how said legislation will be passed.

Continuing, FAZIO stated the meetings are held once a week and that the appointee, RONALD HARMON BROWN, attended the meetings approximately once a month. He stated that BROWN's function was to convey information to the attendees of the meetings and that, in his (FAZIO's) opinion, the appointee could not benefit politically through these meetings.

FAZIO suggested to SA [redacted] that he contact Speaker TOM FOLEY and Majority leader DICK GEPHARDT, United States House of Representatives for their opinions concerning this matter.

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Investigation on 1/4/93 at Washington, D.C. File # 161A-HQ-1042752

by SA [redacted] Date dictated 1/4/93

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

RICHARD GEPHARDT, Majority Leader, United States House of Representatives, Washington, D.C., was advised of the identity of the interviewing agent and the purpose of the interview, that being to obtain his comments concerning the appointee, RONALD HARMON BROWN, and his attendance at Whip meetings. GEPHARDT provided the following information:

GEPHARDT advised that the Whip meetings are held once a week and are attended by sixty-plus House members. The purpose of these meetings is to discuss upcoming bills and current business, among other matters. GEPHARDT stated that he has known the appointee for approximately ten years and has observed the appointee at Whip meetings approximately once a month.

GEPHARDT stated that these meetings were substantive in nature and were not strictly a social exchange. GEPHARDT stated the appointee was invited to these meetings in order to give the attendees a status report regarding the Democratic National Committee. He did not believe BROWN would gain or profit from his attendance.

In GEPHARDT's opinion, BROWN would be in a minimal position to gain insider information at these meetings which would be of financial profit to anyone.

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Investigation on 1/4/93 at Washington, D.C. File # 161A-HQ-1042752

by SA  Date dictated 1/4/93

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

DAVID BONIOR, United States Representative and Majority Whip, United States House of Representatives, Washington, D.C., was advised of the identity of the interviewing agent and the purpose of the interview, that being to obtain his comments concerning the appointee, RONALD HARMON BROWN, and his attendance at Whip Committee meetings. BONIOR provided the following information:

BONIOR stated he observed BROWN having attended meetings of the Whip Committee, which consists of approximately 100 members. BONIOR stated BROWN's function at these meetings was to advise the attendees of the current status and policy decisions of the Democratic National Committee. BONIOR further advised that the function of the meetings substantially consisted of discussions regarding bills which were to be presented by the House of Representatives, along with other political agenda.

It was BONIOR's opinion that the appointee would not be able to benefit politically from his attendance at these meetings; however, his attendance was important in that BONIOR believed it was essential for the Democratic Party and the Democratic Congress to maintain political intercourse.

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Investigation on 1/4/93 at Washington, D.C. File # 161A-HQ-1042752

by SA  Date dictated 1/4/93

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EMPLOYMENT

The following investigation was conducted by Special Agent (SA) [redacted] concerning the appointee, RONALD BROWN:

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[redacted] advised on January 4, 1993, that he has known the appointee since [redacted]

[redacted] stated that at the end of 1981, the Japanese Electronic Bureau, which is based in New York City, hired the Law Firm of PATTON, BOGGS, and BLOW, for advice regarding copyright matters. [redacted] stated that [redacted] was appointed to be [redacted] for PATTON, BOGGS, and BLOW, to represent the Japanese Electronic Bureau. [redacted] stated that the Japanese Electronic Bureau was looking for advice regarding copyright matters regarding VCR in the United States.

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[redacted] stated that the appointee dealt with the lawyers which would represent the different companies that were represented by the Japanese Electronic Bureau. [redacted] added that the United States subsidiaries paid the bills and therefore technically, the appointee was paid by United States representatives, and not the Japanese. [redacted] added that there were perhaps 20 to 22 different subsidiaries that were involved in this particular action.

[redacted] added that the appointee was the main individual at PATTON, BOGGS, and BLOW, until he became the Democratic National Committee Chairman. Since that time, to the best of [redacted] knowledge, BROWN has had nothing to do with the particular representation by the Law Firm of PATTON, BOGGS, and BLOW. [redacted] reiterated that the appointee would have dealt with the American lawyers, and not necessarily with the Japanese directly.

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[redacted] stated that he felt the appointee was an individual of very high integrity, and was a very competent and knowledgeable individual. [redacted] added that he sees no conflict of interest between the appointee's participation as the

lawyer for the Japanese Electronic Bureau and the appointment for which he is being considered.

Socially [ ] stated he has become a good friend of the appointee's over the years, and that he felt that the appointee was a very honest and trustworthy individual.

[ ] stated he has no knowledge of the appointee using or selling illicit drugs or abusing alcohol. The appointee, according to [ ] is emotionally and financially stable, and is in good physical condition. [ ] added that he knows of no reason to question the appointee's character, associates, reputation, or loyalty to the United States Government. [ ] stated that he would and has recommended the appointee for a position of trust with the United States Government.

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[ ] stated that he wanted to reiterate that much of the appointee's activities for the Japanese Electronic Bureau was lobbying against efforts of the motion picture industry against the Japanese Electronic interests within the United States.

WMFO 161A-HQ-1042752

FJB:meh

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CLIENTS

Home Recording Rights Coalition

The following investigation was conducted by Special Agent (SA) [redacted] on January 4, 1993, regarding the appointee, RONALD HARMON BROWN:

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[redacted]  
[redacted] advised that the Home Recording Rights Coalition was formed in 1981. He stated that he was not working with the Coalition at that time, and that he joined the Coalition sometime in [redacted]. He stated that the Coalition was an organization involving copyrights from the viewpoint of the user rather than the producer. He stated that the Coalition represents retailers, consumer groups and software, hardware and chemical agent technical organizations.

He stated that he does not recall exactly when he met the appointee, however, he did meet the appointee while both were working for the Coalition. He stated that his firm [redacted] represented [redacted] as a whole and that the appointee's firm, Patton, Boggs and Blow, as well as the law firms [redacted]

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[redacted] represented individual companies which produced hardware and software for home recording. He stated that these other law firms represented United States subsidiaries of Japanese and other foreign manufacturers of home video equipment and software. He further stated that it was the contention of the Coalition that retailers had the right to sell home recording equipment and tapes to the general public (the users). He stated that this position had been challenged and upheld in favor of the movie producers who contended that this hardware and the tapes would violate their copyright privileges.

He stated that in a Supreme Court decision in January, 1984, in Universal Studios versus SONY CORPORATION, the Supreme Court stated that it was legal for retailers to sell home video equipment and that individuals had the right to own home recording equipment. He stated that this completely changed the industry.

[redacted]  
[redacted]  
[redacted] He stated that the appointee represented individual United States subsidiaries of foreign based companies and lobbied for their positions on Capitol Hill. He stated that the appointee made several trips possibly two or three trips to Japan to discuss the Coalition's accomplishments and strategies for future presentations on Capitol Hill. He further stated that the appointee had a trip right around the time that he became the Democratic National Chairperson. He stated that he was not exactly sure of the dates of the trip, however, he is sure that the trip was planned well in advance of the appointee taking over as the Democratic National Chairperson.

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He stated that the appointee may have obtained some of his expertise in the area of lobbying while being the Chief to the Senate Judiciary Committee. He stated that while in this position, the appointee certainly met the right people and knew how to present his case to them while lobbying on behalf of the companies he represented. He stated that he did not feel that there was anything wrong with the appointee in doing this in that he learned a trade as an attorney and took these learning experiences with him when he went into private practice.

[redacted] stated that he has found the appointee to be a good lawyer and a good congressional relations person and a person who treats other people with respect and dignity. He stated that as far as he knows the appointee was always well prepared and very knowledgeable in all the meetings that he had with the appointee. He noted that these meetings were always attended by large numbers possibly 20 to 30 people representing the different facets of the Coalition. He further stated that his knowledge of the appointee was started out on a professional basis, however, since the appointee has been the Democratic National Chairperson, this professional relationship has turned to more of a social one. He stated that since taking over his duties as the Democratic National Chairperson, that the appointee has not been involved with the Coalition at all.

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[redacted] described the appointee as very personable, and a good person who he has always known to be honest, trustworthy, and reliable. He further stated that the appointee appears to have a stable personality, and to live within his financial means. He commented favorably regarding the appointee's character, associates, reputation, and loyalty to the country, and knows of no derogatory information regarding him. He advised that he has not seen any indication of prescription drug or alcohol abuse by the appointee, nor is he aware of any

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involvement with illegal drugs. He stated the appointee has never expressed or manifested any bias or prejudice against any individual or group based on sex, race, color, religion, national origin, handicap, or age.

[ ] stated that the Coalition further established not to protect any trade but to protect the rights of retailers and individuals to sell and own (respectively) home recording devices. He reiterated that in his opinion, the appointee did an excellent job while working for the Coalition. He further advised that the appointee is well qualified to assume the duties of the position that he is being considered for in the CLINTON Administration. He concluded by stating that he would highly recommend the appointee for a position of trust and confidence with the United States Government.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

[redacted]  
[redacted]  
[redacted] was contacted at [redacted]  
[redacted] regarding presidential appointee, RONALD HARMON BROWN. After being advised of the identity of the interviewing agents [redacted] provided the following information.

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[redacted]  
[redacted] said that he has worked for BROWN since [redacted]  
[redacted] said that he came to Washington D.C. after BROWN was appointed President of Capital/PebSCO [redacted]  
[redacted]

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In response to the question of whether or not BROWN performs in other cities any business similar to that which he performs in the Washington D.C. area for Capital/PebSCO, [redacted] said that BROWN has no Capital/PebSCO representation in any other city.

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[redacted]

When questioned concerning any other contacts with city officials prior [redacted] said he was in regular contact with the Controller's office and Department of Personnel. [redacted] said these were routine contacts regarding the potential contract to see how the matter was proceeding. [redacted] said that BROWN did not meet with any of these officials. [redacted] also met with the Deputy Mayor of the District of Columbia, and reviewed [redacted]  
[redacted]

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b7CInvestigation on 1/4/93 at Washington D.C. File # 161A-HQ-1042752by SA [redacted] SA [redacted] Date dictated 1/4/93b6  
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61A-HQ-1042752

Continuation of FD-302 of [REDACTED], On 1/4/93, Page 2

[REDACTED]

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[REDACTED] said he had no reason to question the character of BROWN and would recommend him for the position for which he had been nominated. [REDACTED] said BROWN had a fine reputation and his loyalty to the United States was beyond question. [REDACTED] said he had no reservations about BROWN and that he is a "good guy."



## 22 USCS § 611

## FOREIGN AFFAIRS

or autographed notices of various kinds, and, in general, all impressions or reproductions obtained on paper or other material assimilable to paper, on parchment or on cardboard, by means of printing, engraving, lithography, autography, or any other easily recognizable mechanical process, with the exception of the copying press, stamps with movable or immovable type, and the typewriter;

(o) The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party;

(p) The term "political consultant" means any person who engages in informing or advising any other person with reference to the domestic or foreign policies of the United States or the political or public interest, policies, or relations of a foreign country or of a foreign political party;

(q) For the purpose of section (3)(d) hereof [22 USCS § 613(d)], activities in furtherance of the bona fide commercial, industrial or financial interests of a domestic person engaged in substantial commercial, industrial or financial operations in the United States shall not be deemed to serve predominantly a foreign interest because such activities also benefit the interests of a foreign person engaged in bona fide trade or commerce which is owned or controlled by, or which owns or controls, such domestic person: Provided, That (i) such foreign person is not, and such activities are not directly or indirectly supervised, directed, controlled, financed or subsidized in whole or in substantial part by, a government of a foreign country or a foreign political party, (ii) the identity of such foreign person is disclosed to the agency or official of the United States with whom such activities are conducted, and (iii) whenever such foreign person owns or controls such domestic person, such activities are substantially in furtherance of the bona fide commercial, industrial or financial interests of such domestic person.

(June 8, 1938, ch 327, § 1, 52 Stat. 631; Aug. 7, 1939, ch 521, § 1, 53 Stat. 1244; Apr. 29, 1942, ch 263, § 1, 56 Stat. 248; Sept. 23, 1950, ch 1024, Title I, § 20(a), 64 Stat. 1005; Aug. 1, 1956, ch 849, § 1, 70 Stat. 899; Oct. 4, 1961, P. L. 87-366, § 1, 75 Stat. 784; July 4, 1966, P. L. 89-486, § 1, 80 Stat. 244; Aug. 12, 1970, P. L. 91-375, § 6(k), 84 Stat. 782.)

### HISTORY; ANCILLARY LAWS AND DIRECTIVES

#### References in text:

"This Act", referred to in this section, is Act June 8, 1938, ch 327, 52 Stat. 631, popularly known as the Foreign Agents Registration Act of 1938, as amended, and appears generally as 22 USCS §§ 611 et seq. For full classification of this Act, consult USCS Tables volumes.

WMFO 161A-HQ-1042752  
LDF

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF HUMAN RESOURCES  
BUREAU OF VITAL STATISTICS  
425 I Street, N.W.,  
Washington, D.C.

On December 31, 1992, AOSM-C [redacted]  
contacted [redacted] Agency Liaison, of the above captioned agency  
regarding the appointee, RONALD HARMON BROWN. [redacted] advised  
that the applicant's birth record revealed as follows:

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CERTIFICATE NUMBER: 41-463263

DATE OF BIRTH: 8/1/41

161A-HQ-1042752  
DFS

U.S. DEPARTMENT OF JUSTICE

PUBLIC INTEGRITY SECTION  
Criminal Division  
1400 New York Avenue, N.W.  
Washington, D.C.

On December 30, 1992, Investigative Assistant (IA) [REDACTED] caused a search to be made of the files of the U.S. DEPARTMENT OF JUSTICE (DOJ), Criminal Division, Public Integrity Section, Washington, D.C., concerning RONALD HARMON BROWN and was advised of the following:

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[REDACTED] Case Management Technician, Public Integrity Section, DOJ, advised IA [REDACTED] that a search of the files concerning the appointee was met with negative results.

WMFO 161A-HQ-1042752  
RLW:rlw

BAR MEMBERSHIP

DISTRICT OF COLUMBIA BAR  
1707 L Street, Northwest  
Washington, D.C.

BAR COUNSEL AND GRIEVANCES/COMPLAINTS OFFICE  
Building A, 515 5th Street, Northwest,  
Washington, D.C.

On December 30, 1992, [redacted] Membership, Records and Information Clerk, District of Columbia Bar, Washington, D.C., advised Investigative Assistant (IA) [redacted] that the appointee RONALD HARMON BROWN is an active member, with an admission date of October 25, 1973.

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On December 30, 1992, [redacted] Receptionist, Office of Bar Counsel and Grievances, Washington, D.C., advised IA [redacted] that a review of the files disclosed that the appointee BROWN is a member in good standing, and there are no grievances on file which have resulted in disciplinary action.

It should be noted that the Bar Counsel will not release any information regarding complaints against attorneys which are currently being investigated, or which do not result in administrative action, suspension, or disbarment.

ENVIRONMENTAL PROTECTION AGENCY (EPA)

410 M Street, S.W.  
Washington, D.C.

On 1/4/93, [redacted] Investigative Systems Specialist, EPA, [redacted] advised Special Agent [redacted] that his records contained no record for the appointee RONALD HARMON BROWN, or NATIONAL ENVIRONMENTAL CONTROLS.

On 1/4/93, [redacted] Office of Security, EPA, [redacted] advised that there was no record regarding the appointee, RONALD HARMON BROWN.

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On 1/4/93, [redacted] Office of Enforcement and Compliance Monitoring, EPA, [redacted] advised that there was no record on the appointee, RONALD HARMON BROWN, or NATIONAL ENVIRONMENTAL CONTROLS.

WMFO 161A-HQ-1042752  
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AGENCY CHECK

FEDERAL COMMUNICATIONS COMMISSION (FCC)  
1919 M Street, Northwest  
Washington, D.C.

On December 31, 1992, [ ] Security Specialist, Office of Security, Federal Communications Commission (FCC), Washington, D.C., advised Investigative Assistant (IA) [ ] that no record was found regarding the appointee, RONALD HARMON BROWN, AKA: RON BROWN, date of birth: August 1, 1941, Social Security Account Number: 095-32-5852, or his affiliated communicative companies, First International Communications Corporation, Kellee Communications, or WKYS.

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[ ] further advised that the Inspector General files contained no identifiable record regarding the appointee BROWN, or his affiliated companies.

WMFO 161A-HQ-1042752  
AD

FEDERAL ELECTION COMMISSION (FEC)

999 E Street, N.W.,  
Washington, D.C.

On December 30, 1992, Investigative Assistant (IA) [redacted] conducted the following investigation at the above captioned agency concerning the candidate, RONALD HARMON BROWN. [redacted] Liaison, Office of the General Counsel advised that the candidate has not appeared as a respondent in any enforcement action conducted by FEC, nor has he/she been named as a defendant in any court case pursued by FEC. There are numerous reports pertaining to mandatory financial reporting requirements for the campaign committee(s) with which the candidate was associated. No civil or criminal actions were taken against the candidate pursuant to these financial reporting requirements by FEC.

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WMFO 161A-HQ-1042752  
AD

FEDERAL ELECTION COMMISSION (FEC)

999 E STREET, N.W.  
Washington, D.C.

On December 31, 1992, Investigative Assistant [redacted] conducted the following investigation at the above captioned agency concerning the candidate, RONALD HARMON BROWN. [redacted] Liaison, Office of the General Counsel advised that the candidate has not appeared as a respondent in any enforcement action conducted by FEC, nor has he been named as a defendant in any court case pursued by FEC.

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FEC contained numerous records regarding the Democratic National Committee in which BROWN is Chairman. There are 11 files in which the Committee is named as the Respondent and 3 files in which the Committee is named as the Complainant.

Listed below are the MUR numbers for the aforementioned files:

<u>MUR</u>	<u>OPENED</u>	<u>CLOSED</u>	
29	8/4/75	- 11/12/75	Respondent
77	1/28/76	- 7/26/76	Complainant
530	3/30/78	- 8/28/78	Respondent
595	5/12/78	- 12/7/78	Respondent
1166	11/18/80	- 8/12/82	Respondent
1206	12/22/80	- 7/13/82	Respondent (file is in the name of the Democratic National Committee Service Corporation)
1252	7/3/80	- 5/24/83	Complainant
1290	9/4/80	- 9/18/80	Respondent
1730	8/14/84	- 12/10/85	Respondent
1766	8/28/84	- 1/15/85	Respondent
2156	3/28/86	- 7/1/86	Respondent
2620	6/6/88	- 7/13/88	Respondent
2670	8/12/88	- 1/11/89	Complainant
2703	9/26/88	- 8/24/90	Respondent



WMFO 161A-HQ-1042752  
GLC

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BANKING RECORD CHECKS

FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC)  
1777 F STREET N.W.  
Washington, D.C.

On 1/4/93, [REDACTED] FDIC, telephone (202) 898-6793, advised Personnel Security Specialist (SA) [REDACTED] that a search of their three data banks revealed no record concerning the appointee, RONALD HARMON BROWN, or the Boston Bank of Commerce.

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WMFO 161A-HQ-1042752  
GLC

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FEDERAL RESERVE SYSTEM  
20th Street and Constitution Avenue N.W.  
Washington, D.C.

On 1/4/93, [redacted] Enforcement Division,  
telephone (202) 452-2718, advised Personnel Security Specialist  
[redacted] that a search of their records reveals no criminal  
referral or institutional file relating to RONALD HARMON  
BROWN or BOSTON BANK OF COMMERCE.

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COMPTROLLER OF THE CURRENCY

Comptroller of the Currency  
250 E Street, S.W.  
Washington, D.C.

Special Agent [redacted] caused a search to be made of the records of the Comptroller of the Currency, and was advised on 12/30/92, by [redacted] Enforcement Compliance Division, that no records could be located regarding the appointee, RONALD HARMON BROWN, or BOSTON BANK OF COMMERCE.

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161A-HQ-1042752

GHS:ahb

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Office of Records and Registration  
Clerk of the House  
United States House of Representatives  
Washington, D.C.

The following investigation was conducted by Special Agent [redacted] on January 4, 1993, concerning the appointee, RONALD HARMON BROWN:

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[redacted] Records Clerk, Office of Records and Registration for the House of Representatives, advised her records reflect that the appointee, RONALD HARMON BROWN, 2550 M Street, Northwest, Washington, D.C., was a registered lobbyist for Wayne County, Michigan from June, 1988, to April, 1989.

161A-HQ-1042752

GHS:ahb

1

Secretary of the Senate  
United States Senate  
Washington, D.C.

The following investigation was conducted by Special Agent [redacted] on January 4, 1993, concerning the appointee, RONALD HARMON BROWN:

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[redacted] Lobby Registrar, Office of the Secretary of the Senate, advised her records reflect the appointee, RONALD HARMON BROWN, 2550 M Street, Northwest, Washington, D.C., was a registered lobbyist for Wayne County, Michigan from June, 1988, to April, 1989.

WMFO 161A-HQ-1042752  
TCR:glc

SECURITIES AND EXCHANGE COMMISSION

450 5th Street, N.W.  
WASHINGTON, D.C.

The following investigation was conducted by  
Supervisory Special Agent (SSA) [redacted]  
regarding the appointee, RONALD HARMON BROWN:

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On 12/31/92, [redacted] Investigator, Enforcement  
Division, SEC, telephone [redacted] advised that the non-  
public and investigative files of that office were reviewed for  
any information on the appointee and the below listed companies  
with which the appointee may have been associated:

First International Communications, Corp.;  
Harmon International, Inc.;  
Chemfix Technologies, Inc.;  
Kellee Communications, Inc.;  
Capital/PEBSCO, Inc.;  
WKYS Radio Station;  
Boston Bank of Commerce; and  
National Environmental Control.

[redacted] advised that there is no record of any SEC  
investigative activity in connection with the appointee.

[redacted] advised that records reflect no adverse  
information about any of the above listed firms with the  
exception of Chemfix, which is under SEC investigation for  
allegations of insider trading. [redacted] further advised the he  
personally contacted the New York SEC office on this date and  
determined from them that the appointee is not a subject of the  
Chemfix inquiry.

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WMFO 161-HQ-1042752  
CH:jmf

DRIVER'S RECORD

DEPARTMENT OF TRANSPORTATION  
Bureau of Motor Vehicle Services  
District of Columbia Government  
301 C Street, N.W.  
Washington, D.C.

On December 31, 1992, Investigative Assistant (IA) [REDACTED] searched the computerized records of the DEPARTMENT OF TRANSPORTATION, Bureau of Motor Vehicle Services, for the District of Columbia Government and determined that the following record was located concerning the applicant, RONALD HARMON BROWN, aka RON BROWN.

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<u>DATE</u>	<u>ACTION</u>
08/02/87	DISOBEYING OFFICIAL SIGN OR SIGNAL DEVICE CD: No HZ: No NOI#: 86131377 ISSUED BY: Park Police ACCIDENT: No VEH: JAGU
08/31/87	DISP: Payment PERMIT: DC 095325852
06/11/85	UNDEFINED CD: No HZ: No NOI#: 00000001 ISSUED BY: Virginia ACCIDENT: No VEH:
06/11/85	DISP: Superior Ct, Convicted PERMIT: DC 095325852
05/14/85	OPERATING ON EXPIRED INSPECTION STICKER CD: No HZ: No NOI#: 82909473 ISSUED BY: First District ACCIDENT: No VEH: JAGU

WMFO 161-HQ-1042752

<u>DATE</u>	<u>ACTION</u>
12/11/85	DISP: Payment PERMIT: DC 095325852 TOTAL POINTS: 0



WMFO 161A-HQ-1042752  
PAK:wde

NATIONAL PARK SERVICE  
U.S. PARK POLICE  
1100 OHIO DRIVE, SOUTHWEST  
WASHINGTON, D.C.

On 12/31/92, Investigative Assistant (IA) [REDACTED]  
searched the files of the U.S. Park Police and no identifiable  
adult criminal record was located concerning the candidate,  
RONALD HARMON BROWN.

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WMFO 161A-HQ-1042752  
GLC

LAW ENFORCEMENT AGENCIES

On 12/31/92, a query was made of the Washington Area Law Enforcement System (WALES) computer and it was determined that no record was located at the Metropolitan Police Department concerning the appointee.

On 12/30/92, a computerized check of the Central Criminal Records Exchange (CCRE/VCIN), Virginia State Police (VSP), Richmond, Virginia, failed to reflect any information identifiable with the appointee.

On 12/31/92, a computerized check of the Department of Motor Vehicles, Richmond, Virginia, revealed no record concerning the appointee.

It is noted that at all times an indefinite number of unidentified records may not be in the computer and not available for review.

WMFO 161A-HQ-1042752  
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AGENCY CHECK

UNITED STATES SECRET SERVICE (USSS)  
1800 G Street, Northwest  
Washington, D.C.

On January 4, 1993, Investigative Assistant (IA) [ ]  
[ ] caused a search to be made of the files of the United  
States Secret Service (USSS), Washington, D.C., and was advised  
that no record was found regarding the appointee, RONALD HARMON  
BROWN, AKA: RON BROWN.

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161A-HQ-1042752  
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DEPARTMENT OF JUSTICE

FOREIGN AGENTS REGISTRATION ACT  
1400 New York Avenue, N.W.  
Washington, D.C.

Special Agent [redacted] caused a search to be made of the records of the Foreign Agents Registration Act, and was advised on 12/30/92, by [redacted] that the appointee, RONALD HARMON BROWN was registered for PATTON BOGGS & BLOW on 10/15/82. [redacted] advised that his short form was terminated on 7/31/92. Her records show that BROWN was registered as partner in the above mentioned law firm. [redacted] advised that there was no record of BOSTON BANK OF COMMERCE.

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DOJ/Foreign Agents Registration Act

On December 31, 1992, SA [redacted] contacted [redacted] DOJ/Foreign Agents Registration Division, 1440 NY Avenue, Washington, DC. [redacted] advised that appointee, RONALD HARMON BROWN was registered as a Foreign Agent through the law firm of PATTON, BOGGS and BLOW on 10/15/82 and his registration was terminated on 7/31/92. [redacted] advised that the appointee was registered as a Foreign Agent for the entities under which PATTON, BOGGS, and BLOW were registered. These entities were as follows:

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1. Government of OMAN
2. Government of HATI
3. Japan Airlines
4. Proscsadora De Carne (GUATAMALA)
5. Duty Free Shopper Ltd. (HONG KONG)
6. Hampton Windsor (Republic of ZAIRE)
7. Republic of GARBON
8. Asociacion of AZUCAREROS DE GUATAMALA
9. E. Palicio E Y CIA (VENEZULA)
10. Por Larranaga Fabrica De Tabacos (Spain)
11. Menendez Garcia E Y CIA (Spain)

This information matches the information contained on page 39 of the article "PRIVATE PARTIES: Political Party Leadership in Washington's Mercenary Culture."

WMFO 161A-HQ-1042752  
GLC

MISCELLANEOUS

The following investigation was conducted by Special Agent (SA) [redacted] on 12/31/92 at the Foreign Agents Registration Division, Department of Justice, Washington, D.C.:

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Attached are the investigative results of checks at the above Agency.

22 USCS Sec. 611 et al

On December 31, 1992, [redacted] of DOJ/Foreign Agents Registration Division, 1440 New York Avenue, Washington, DC. advised that the appropriate regulations governing Foreign Agent's registration is 22 USC Sec. 611 et al. A review of this Statute provides the following with respect to required registration and attached are a copy of the appropriate sections.

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22 USC Sec. 611 (d) defines an agent of a foreign principal as follows:

(1) any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal, and who directly or through any other person-

(i) engages within the United States in political activities for or in the interests of such foreign principle;

(ii) acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principle;

(iii) within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; or

(iv) within the United States represents the interests of such foreign principle before any agency or official of the Government of the United States; and

(2) any person who agrees, consents, assumes or purports to act as, or who is or holds himself out to be, whether or not pursuant to contractual relationship, an agent of a foreign principle as defined in clause (1) of this subsection.

An example of a pertinent holding regarding the requirement of registration is as follows:

"Agent" of foreign government required to register is one who acts at order, requires, or under direction or control of foreign principle, and must engage in alleged political activity

for or in interest of foreign principal; in order to meet first requirement approving that defendant is agent, relationship between parties must be shown; it is not necessary to show that principal both directs and controls agent, since requirements of statute are stated in disjunctive; there is no distinction between paid and unpaid agents, and use of volunteers does not argue against finding of agency status; mere coincidence of editorial views of newspaper are not sufficient to satisfy requirement of act but may shed light on question whether alleged agent acts on behalf of principle. Atty. Gen. of United States vs. Irish People, Inc. (1984 DC Dist Col) 595 F Supp 1111.



## FOREIGN AGENTS &amp; PROPAGANDA

## 22 USCS § 611

"5. This order shall become effective as of June 1, 1942."

## CROSS REFERENCES

This subchapter is referred to in 8 USCS § 1251; 18 USCS § 219; 50 USCS Appx § 34.

## § 611. Definitions

As used in and for the purposes of this Act—

(a) The term "person" includes an individual, partnership, association, corporation, organization, or any other combination of individuals;

(b) The term "foreign principal" includes—

(1) a government of a foreign country and a foreign political party;

(2) a person outside of the United States, unless it is established that such person is an individual and a citizen of and domiciled within the United States, or that such person is not an individual and is organized under or created by the laws of the United States or of any State or other place subject to the jurisdiction of the United States and has its principal place of business within the United States; and

(3) a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.

(c) Except [Except] as provided in subsection (d) hereof, the term "agent of a foreign principal" means—

(1) any person who acts as an agent, representative, employee, or servant, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign principal or of a person any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign principal, and who directly or through any other person—

(i) engages within the United States in political activities for or in the interests of such foreign principal;

(ii) acts within the United States as a public relations counsel, publicity agent, information-service employee or political consultant for or in the interests of such foreign principal;

(iii) within the United States solicits, collects, disburses, or dispenses contributions, loans, money, or other things of value for or in the interest of such foreign principal; or

(iv) within the United States represents the interests of such foreign principal before any agency or official of the Government of the United States; and

(2) any person who agrees, consents, assumes or purports to act as, or who is or holds himself out to be, whether or not pursuant to contractual relationship, an agent of a foreign principal as defined in clause (1) of this subsection.

## 22 USCS § 611

## FOREIGN AFFAIRS

(d) The term "agent of a foreign principal" does not include any news or press service or association organized under the laws of the United States or of any State or other place subject to the jurisdiction of the United States, or any newspaper, magazine, periodical, or other publication for which there is on file with the United States Postal Service information in compliance with Section 3611 [3685] of Title 39, United States Code [39 USCS § 3685], published in the United States, solely by virtue of any bona fide news or journalistic activities, including the solicitation or acceptance of advertisements, subscriptions, or other compensation therefor, so long as it is at least 80 per centum beneficially owned by, and its officers and directors, if any, are citizens of the United States, and such news or press service or association, newspaper, magazine, periodical, or other publication, is not owned, directed, supervised, controlled, subsidized, or financed, and none of its policies are determined by any foreign principal defined in section 1(b) hereof [subsec. (b) of the section], or by any agent of a foreign principal required to register under this Act

(e) The term "government of a foreign country" includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States;

(f) The term "foreign political party" includes any organization or any other combination of individuals in a country other than the United States, or any unit or branch thereof, having for an aim or purpose, or which is engaged in any activity devoted in whole or in part to, the establishment, administration, control, or acquisition of administration or control, of a government of a foreign country or a subdivision thereof, or the furtherance or influencing of the political or public interests, policies, or relations of a government of a foreign country or a subdivision thereof;

(g) The term "public-relations counsel" includes any person who engages directly or indirectly in informing, advising or in any way representing a principal in any public relations matter pertaining to political or public interests, policies, or relations of such principal;

(h) The term "publicity agent" includes any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or otherwise;

(i) The term "information-service employee" includes any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions,

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## 22 USCS § 611

information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts, or conditions of any country other than the United States or of any government of a foreign country or of a foreign political party or of a partnership, association, corporation, organization, or other combination of individuals organized under the laws of, or having its principal place of business in, a foreign country;

(j) The term "political propaganda" includes any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence. As used in this section 1(j) [this subsection] the term "disseminating" includes transmitting or causing to be transmitted in the United States mails or by any means or instrumentality of interstate or foreign commerce or offering or causing to be offered in the United States mails;

(k) The term "registration statement" means the registration statement required to be filed with the Attorney General under section 2(a) hereof [22 USCS § 612(a)], and any supplements thereto required to be filed under section 2(b) hereof [22 USCS § 612(b)], and includes all documents and papers required to be filed therewith or amendatory thereof or supplemental thereto, whether attached thereto or incorporated therein by reference;

(l) The term "American republic" includes any of the states which were signatory to the Final Act of the Second Meeting of the Ministers of Foreign Affairs of the American Republics at Habana, Cuba, July 30, 1940;

(m) The term "United States", when used in a geographical sense, includes the several States, the District of Columbia, the Territories, the Canal Zone, the insular possessions, [including the Philippine Islands,] and all other places now or hereafter subject to the civil or military jurisdiction of the United States;

(n) The term "prints" means newspapers and periodicals, books, pamphlets, sheet music, visiting cards, address cards, printing proofs, engravings, photographs, pictures, drawings, plans, maps, patterns to be cut out, catalogs, prospectuses, advertisements, and printed, engraved, lithographed,

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## 22 USCS § 611

remainder of the Act [22 USCS §§ 611 et seq.], and the application of such provisions to other persons or circumstances, shall not be affected thereby. "This Act [22 USCS §§ 611 et seq.] is in addition to and not in substitution for any other existing statute."

**Policy and purpose.** Preface of Act Apr. 29, 1942, ch 263, 56 Stat. 248, provided: "It is hereby declared to be the policy and purpose of this Act [22 USCS §§ 611 et seq.] to protect the national defense, internal security, and foreign relations of the United States by requiring public disclosure by persons engaging in propaganda activities and other activities for or on behalf of foreign governments, foreign political parties, and other foreign principals so that the Government and the people of the United States may be informed of the identity of such persons and may appraise their statements and actions in the light of their associations and activities."

**Effective date and application of 1942 amendment; Attorney General's authority.** Act Apr. 29, 1942, ch 263, § 3, 56 Stat. 258, provided: "This Act [amending 22 USCS §§ 611-617; adding 22 USCS §§ 611 notes, 618-621] shall take effect on the sixtieth day after the date of its approval [enacted Apr. 29, 1942], except that prior to such sixtieth day the Attorney General may make, prescribe, amend, and rescind such rules, regulations, and forms as may be necessary to carry out the provisions of this Act [amending 22 USCS §§ 611-617; adding 22 USCS §§ 611 notes, 618-621]."

**Effective date of 1966 amendment.** Act July 4, 1966, P. L. 89-486, § 9, 80 Stat. 249, provided: "This Act [adding 18 USCS §§ 219, 613; amending 22 USCS §§ 611-616, 618] shall take effect ninety days after the date of its enactment [enacted July 4, 1966]."

## CROSS REFERENCES

Registration functions of the Secretary of State transferred to the Attorney General, Ex. Ord. No. 9176, 22 USCS prec § 611.

Military or civilian censorship prohibited, and preservation of certain constitutional rights, 50 USCS § 798.

This section is referred to in 2 USCS § 441e; 8 USCS § 1251; 22 USCS § 618.

## RESEARCH GUIDE

**Am Jur:**

3 Am Jur 2d, Aliens and Citizens § 79.

45 Am Jur 2d, International Law § 9.

51 Am Jur 2d, Lobbying § 12.

**Forms:**

10 Federal Procedural Forms L Ed, Foreign Relations, §§ 32:42, 32:46.

**Law Review Articles:**

Attorneys under the Foreign Agents Registration Act of 1938. 78 Harv L Rev 619.

## FOREIGN AGENTS &amp; PROPAGANDA

## 22 USCS § 612

a true and complete copy of its charter, articles of incorporation, association, constitution, and bylaws, and amendments thereto; a copy of every other instrument or document and a statement of the terms and conditions of every oral agreement relating to its organization, powers, and purposes; and a statement of its ownership and control;

(3) A comprehensive statement of the nature of registrant's business; a complete list of registrant's employees and a statement of the nature of the work of each; the name and address of every foreign principal for whom the registrant is acting, assuming or purporting to act or has agreed to act; the character of the business or other activities of every such foreign principal, and, if any such foreign principal be other than a natural person, a statement of the ownership and control of each; and the extent, if any, to which each such foreign principal is supervised, directed, owned, controlled, financed, or subsidized, in whole or in part, by any government of a foreign country or foreign political party, or by any other foreign principal;

(4) Copies of each written agreement and the terms and conditions of each oral agreement, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is an agent of a foreign principal; a comprehensive statement of the nature and method of performance of each such contract, and of the existing and proposed activity or activities engaged in or to be engaged in by the registrant as agent of a foreign principal for each such foreign principal, including a detailed statement of any such activity which is a political activity;

(5) The nature and amount of contributions, income, money, or thing of value, if any, that the registrant has received within the preceding sixty days from each such foreign principal, either as compensation or for disbursement or otherwise, and the form and time of each such payment and from whom received;

(6) A detailed statement of every activity which the registrant is performing or is assuming or purporting or has agreed to perform for himself or any other person other than a foreign principal and which requires his registration hereunder;

(7) The name, business, and residence addresses, and if an individual, the nationality, of any person other than a foreign principal for whom the registrant is acting, assuming or purporting to act or has agreed to act under such circumstances as require his registration hereunder; the extent to which each such person is supervised, directed, owned, controlled, financed, or subsidized, in whole or in part, by any government of a foreign country or foreign political party or by any other foreign principal; and the nature and amount of contributions, income, money, or thing of value, if any, that the registrant has received during the preceding sixty days from each such person in connection with any of the activities referred to in clause (6) of this subsection, either as

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## FOREIGN AFFAIRS

compensation or for disbursement or otherwise, and the form and time of each such payment and from whom received;

(8) A detailed statement of the money and other things of value spent or disposed of by the registrant during the preceding sixty days in furtherance of or in connection [connection] with activities which require his registration hereunder and which have been undertaken by him either as an agent of a foreign principal or for himself or any other person or in connection with any activities relating to his becoming an agent of such principal, and a detailed statement of any contributions of money or other things of value made by him during the preceding sixty days (other than contributions the making of which is prohibited under the terms of section 613 of title 18, United States Code) in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office;

(9) Copies of each written agreement and the terms and conditions of each oral agreement, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is performing or assuming or purporting or has agreed to perform for himself or for a foreign principal or for any person other than a foreign principal any activities which require his registration hereunder;

(10) Such other statements, information, or documents pertinent to the purposes of this Act as the Attorney General, having due regard for the national security and the public interest, may from time to time require;

(11) Such further statements and such further copies of documents as are necessary to make the statements made in the registration statement and supplements thereto, and the copies of documents furnished therewith, not misleading.

(b) **Supplements; filing period.** Every agent of a foreign principal who has filed a registration statement required by section 2(a) hereof [subsec. (a) of this section] shall, within thirty days after the expiration of each period of six months succeeding such filing, file with the Attorney General a supplement thereto, under oath, on a form prescribed by the Attorney General, which shall set forth with respect to such preceding six months' period such facts as the Attorney General, having due regard for the national security and the public interest, may deem necessary to make the information required under section 2 hereof [this section] accurate, complete, and current with respect to such period. In connection with the information furnished under clauses (3), (4), (6), and (9) of section 2(a) hereof [subsec. (a) (3), (4), (6), (9) of this section], the registrant shall give notice to the Attorney General of any changes therein within ten days after such changes occur. If the Attorney General, having due regard for the national security and the public interest, determines that it is necessary to

## FOREIGN AGENTS &amp; PROPAGANDA

22 USCS § 612

carry out the purposes of this Act, he may, in any particular case, require supplements to the registration statement to be filed at more frequent intervals in respect to all or particular items of information to be furnished.

(c) **Execution of statement under oath.** The registration statement and supplement thereto shall be executed under oath as follows: If the registrant is an individual, by him; if the registrant is a partnership, by the majority of the members thereof; if the registrant is a person other than an individual or a partnership, by a majority of the officers thereof or persons performing the functions of officers or by a majority of the board of directors thereof or persons performing the functions of directors, if any.

(d) **Filing of statement not deemed full compliance nor as preclusion from prosecution.** The fact that a registration statement or supplement thereto has been filed shall not necessarily be deemed a full compliance with this Act and the regulations thereunder on the part of the registrant; nor shall it indicate that the Attorney General has in any way passed upon the merits of such registration statement or supplement thereto; nor shall it preclude prosecution, as provided for in this Act, for willful failure to file a registration statement or supplement thereto when due or for a willful false statement of a material fact therein or the willful omission of a material fact required to be stated therein or the willful omission of a material fact or copy of a material document necessary to make the statements made in a registration statement and supplements thereto, and the copies of documents furnished therewith, not misleading.

(e) **Incorporation of previous statement by reference.** If any agent of a foreign principal, required to register under the provisions of this Act, has previously thereto registered with the Attorney General under the provisions of the Act of October 17, 1940 (54 Stat. 1201), the Attorney General, in order to eliminate inappropriate duplication, may permit the incorporation by reference in the registration statement or supplements thereto filed hereunder of any information or documents previously filed by such agent of a foreign principal under the provisions of the Act of October 17, 1940 (54 Stat. 1201).

(f) **Exemption by Attorney General.** The Attorney General may, by regulation, provide for the exemption—

- (1) from registration, or from the requirement of furnishing any of the information required by this section, of any person who is listed as a partner, officer, director, or employee in the registration statement filed by an agent of a foreign principal under this Act, and
- (2) from the requirement of furnishing any of the information required by this section of any agent of a foreign principal.

where by reason of the nature of the functions or activities of such person the Attorney General, having due regard for the national security and the public interest, determines that such registration, or the furnishing of such

**22 USCS § 612****FOREIGN AFFAIRS**

information, as the case may be, is not necessary to carry out the purposes of this Act.

(June 8, 1938, ch 327, § 2, 52 Stat. 632; Apr. 29, 1942, ch 263, § 1, 56 Stat. 251; Aug. 3, 1950, ch 524, § 1, 64 Stat. 399; July 4, 1966, P. L. 89-486, § 2, 80 Stat. 245.)

**HISTORY; ANCILLARY LAWS AND DIRECTIVES****References in text:**

"This Act", referred to in this section, is Act June 8, 1938, ch 327, 52 Stat. 631, popularly known as the Foreign Agents Registration Act of 1938, as amended, and appears generally as 22 USCS §§ 611 et seq. For full classification of this Act, consult USCS Tables volumes.

"Section 613 of title 18, United States Code", referred to in this section, was repealed by Act May 11, 1976, P. L. 94-283, Title II, § 201(a), 90 Stat. 496. The section prohibited campaign contributions by foreign nationals. Similar provisions now appear as 2 USCS § 441e.

The "Act of October 17, 1940 (54 Stat. 1201)", referred to in this section, formerly appeared as 18 USC §§ 14-17, and was repealed by Act June 25, 1948, ch 645, § 21, 62 Stat. 862. Similar provisions are now contained in 18 USCS § 2386.

**Explanatory notes:**

The bracketed word "connection" in subsec. (a)(8) is inserted as the word probably intended by Congress. Prior similar provisions were contained in 22 USC §§ 612, 613, prior to the general amendment of Act June 8, 1938, by Act Apr. 29, 1942.

**Effective date of section:**

For effective date of this section, see Effective date of section note at 22 USCS § 611.

**Amendments:**

1942, Act Apr. 29, 1942 (effective on the sixtieth day after the date of approval on 4/29/42, as provided by § 3 of such Act, which appears as 22 USCS § 611 note), substituted this section for one which read:

"Every person who is now an agent of a foreign principal shall, within thirty days after this Act takes effect, and every person who shall hereafter become an agent of a foreign principal shall forthwith file with the Secretary a registration statement, under oath, on a form prescribed by the Secretary which shall set forth—

"(a) The name, business address, and residence address of the registrant;

"(b) The name of the foreign principal or other person or organization for which such person is acting as agent;

"(c) A copy of all contracts of employment under which such person acts or agrees to act as such agent, if written, or a full statement of the terms and conditions thereof, if oral;

"(d) The date when each such contract was made, the date of commencement of activity thereunder, and the period during which such contract is to be in effect;



## FOREIGN AGENTS &amp; PROPAGANDA

## 22 USCS § 613

of registrants other than those in which they have engaged "as agent." *Viereck v United States* (1943) 318 US 236, 87 L Ed 734, 63 S Ct 561.

Secretary of state may propound questions in registration statement and require answers thereto, under the penal sanctions calling for a comprehensive statement of the nature of registrant's business. *Viereck v United States* (1944)

78 App DC 279, 139 F2d 847, cert den 321 US 794, 88 L Ed 1083, 64 S Ct 787.

## 4. Effect of non-registration

Willful failure of a registered foreign agent to disclose activities which were wholly on his own behalf was not (prior to 1942 Amendment) a criminal offense. *Viereck v United States* (1943) 318 US 236, 87 L Ed 734, 63 S Ct 561.

## § 613. Exemptions

The requirements of section 2(a) hereof [22 USCS § 612(a)] shall not apply to the following agents of foreign principals:

(a) **Diplomatic or consular officers.** A duly accredited diplomatic or consular officer of a foreign government who is so recognized by the Department of State, while said officer is engaged exclusively in activities which are recognized by the Department of State as being within the scope of the functions of such officer;

(b) **Official of foreign government.** Any official of a foreign government, if such government is recognized by the United States, who is not a public-relations counsel, publicity agent, information-service employee, or a citizen of the United States, whose name and status and the character of whose duties as such official are of public record in the Department of State, while said official is engaged exclusively in activities which are recognized by the Department of State as being within the scope of the functions of such official;

(c) **Staff members of diplomatic or consular officers.** Any member of the staff of, or any person employed by, a duly accredited diplomatic or consular officer of a foreign government who is so recognized by the Department of State, other than a public-relations counsel, publicity agent, or information-service employee, whose name and status and the character of whose duties as such member or employee are of public record in the Department of State, while said member or employee is engaged exclusively in the performance of activities which are recognized by the Department of State as being within the scope of the functions of such member or employee;

(d) **Private and nonpolitical activities; solicitation of funds.** Any person engaging or agreeing to engage only (1) in private and nonpolitical activities in furtherance of the bona fide trade or commerce of such foreign principal; or (2) in other activities not serving predominantly a foreign interest; or (3) in the soliciting or collecting of funds and contributions within the United States to be used only for medical aid and assistance, or for food and clothing to relieve human suffering, if such solicitation or collection of funds and contributions is in accordance with and subject to the provisions of the Act of November 4, 1939, as amended (54 Stat. 4), and such rules and regulations as may be prescribed thereunder;

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(e) Religious, scholastic, or scientific pursuits. Any person engaging or agreeing to engage only in activities in furtherance of bona fide religious, scholastic, academic, or scientific pursuits or of the fine arts;

(f) Defense of foreign government vital to United States defense. Any person, or employee of such person, whose foreign principal is a government of a foreign country the defense of which the President deems vital to the defense of the United States while, (1) such person or employee engages only in activities which are in furtherance of the policies, public interest, or national defense both of such government and of the Government of the United States, and are not intended to conflict with any of the domestic or foreign policies of the Government of the United States, (2) each communication or expression by such person or employee which he intends to, or has reason to believe will, be published, disseminated, or circulated among any section of the public, or portion thereof, within the United States, is a part of such activities and is believed by such person to be truthful and accurate and the identity of such person as an agent of such foreign principal is disclosed therein, and (3) such government of a foreign country furnishes to the Secretary of State for transmittal to, and retention for the duration of this Act by, the Attorney General such information as to the identity and activities of such person or employee at such times as the Attorney General may require. Upon notice to the Government of which such person is an agent or to such person or employee, the Attorney General, having due regard for the public interest and national defense, may, with the approval of the Secretary of State, and shall, at the request of the Secretary of State, terminate in whole or in part the exemption herein of any such person or employee;

(g) Persons qualified to practice law. Any person qualified to practice law, insofar as he engages or agrees to engage in the legal representation of a disclosed foreign principal before any court of law or any agency of the Government of the United States: Provided, That for the purposes of this subsection legal representation does not include attempts to influence or persuade agency personnel or officials other than in the course of established agency proceedings, whether formal or informal.

(June 8, 1938, ch 327, § 3, 52 Stat. 632; Aug. 7, 1939, ch 521, § 2, 53 Stat. 1245; Apr. 29, 1942, ch 263, § 1, 56 Stat. 254; Oct. 4, 1961, P. L. 87-366, § 2, 75 Stat. 784; July 4, 1966, P. L. 89-486, § 3, 80 Stat. 246.)

## HISTORY; ANCILLARY LAWS AND DIRECTIVES

## References in text:

"The Act of November 4, 1939, as amended (54 Stat. 4)", referred to in this section, is Act Nov. 4, 1939, ch 2, 54 Stat. 4, popularly known as the Neutrality Act of 1939, which appears generally as 22 USCS §§ 441 et seq. For full classification of such Act, consult USCS Tables volumes.

"This Act", referred to in this section, is Act June 8, 1938, ch 327, 52 Stat. 631, popularly known as the Foreign Agents Registration Act of

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FOREIGN AGENTS & PROPAGANDA

22 USCS § 616

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CROSS REFERENCES

Registration functions of the Secretary of State transferred to the Attorney General, Ex. Ord. No. 9176, 22 USCS prec § 611.  
This section is referred to in 8 USCS § 1251; 22 USCS § 617.

RESEARCH GUIDE

Forms:  
10 Federal Procedural Forms L Ed, Foreign Relations, §§ 32:42, 32:46.  
  
Law Review Articles:  
Stern, Foreign Agents Registration Act—Attorney-Client Privilege Exception to Disclosure Requirements—Atty. Gen. of United States v Covington & Burling (1976, DC Dist Col) 411 F Supp 371, later op (DC Dist Col) 430 F Supp 1117. 19 Harv Int LJ 329, Winter, 1978.

INTERPRETIVE NOTES AND DECISIONS

Phrase "books of account and other records" set forth in 22 USCS § 615 included records which tended to reveal confidential communications between foreign principal and its agent-attorney concerning legal matters; an attorney who represented foreign principal and who registered as agent under this Act could validly claim attorney-client privilege to withhold from disclosure to Federal Government documents which were required to be kept under such Act; however, whether such documents were properly within scope of privilege was for court to determine. Atty. Gen. of United States v Covington & Burling (1976, DC Dist Col) 411 F Supp 371, later op (DC Dist Col) 730 F Supp 1117.

§ 616. Public examination of official records; transmittal of records and information

(a) Permanent copy of statement; inspection; withdrawal. The Attorney General shall retain in permanent form one copy of all registration statements and all statements concerning the distribution of political propaganda furnished under this Act, and the same shall be public records and open to public examination and inspection at such reasonable hours, under such regulations, as the Attorney General may prescribe, and copies of the same shall be furnished to every applicant at such reasonable fee as the Attorney General may prescribe. The Attorney General may withdraw from public examination the registration statement and other statements of any agent of a foreign principal whose activities have ceased to be of a character which requires registration under the provisions of this Act.

(b) Secretary of State. The Attorney General shall, promptly upon receipt, transmit one copy of every registration statement filed hereunder and one copy of every amendment or supplement thereto, and one copy of every item of political propaganda filed hereunder, to the Secretary of State for such comment and use as the Secretary of State may determine to be appropriate from the point of view of the foreign relations of the United

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States. Failure of the Attorney General so to transmit such copy shall not be a bar to prosecution under this Act.

(c) Executive departments and agencies; Congressional committees. The Attorney General is authorized to furnish to departments and agencies in the executive branch and committees of the Congress such information obtained by him in the administration of this Act, including the names of registrants under this Act, copies of registration statements, or parts thereof, copies of political propaganda, or other documents or information filed under this Act, as may be appropriate in the light of the purposes of this Act.

(June 8, 1938, ch 327, § 6, 52 Stat. 633; Apr. 29, 1942, ch 263, § 1, 56 Stat. 256; July 4, 1966, P. L. 89-486, § 6, 80 Stat. 247.)

### HISTORY; ANCILLARY LAWS AND DIRECTIVES

#### References in text:

"This Act", referred to in this section, is Act June 8, 1938, ch 327, 52 Stat. 631, popularly known as the Foreign Agents Registration Act of 1938, as amended, and appears generally as 22 USCS §§ 611 et seq. For full classification of this Act, consult USCS Tables volumes.

#### Explanatory notes:

Prior to the general amendment of Act June 8, 1938, by Act Apr. 29, 1942, this section related to rules and regulations. Similar provisions now appear as 22 USCS § 620.

Prior similar provisions were contained in 22 USC § 614 prior to the general amendment of Act June 8, 1938, by Act Apr. 29, 1942.

#### Effective date of section:

For effective date of this section, see Effective date of section note at 22 USCS § 611.

#### Amendments:

1942. Act Apr. 29, 1942 (effective on the sixtieth day after the date of approval on 4/29/42, as provided by § 3 of such Act, which appears as 22 USCS § 611 note), substituted this section for one which read: "The Secretary is authorized and directed to prescribe such rules, regulations, and forms as may be necessary to carry out this Act."

1966. Act July 4, 1966 (effective ninety days after enactment on 7/4/66, as provided by § 9 of such Act, which appears as 22 USCS § 611 note), inserted "(a)" and added subsecs. (b) and (c).

#### Other provisions:

Authority of Attorney General to prescribe rules, etc. prior to the effective date of Act Apr. 29, 1942. For authority of the Attorney General to make, prescribe, amend, and rescind such rules, regulations, and forms as may be necessary to carry out the provisions of 22 USCS §§ 611 et seq., see § 3 of Act Apr. 29, 1942, which appears as 22 USCS § 611 note.

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## MATERIALS, AND

## FOREIGN AGENTS & PROPAGANDA

## 22 USCS § 611

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tensions of time for over one year. United States v  
22,152 Articles of Aircraft Parts (1984, ND Ill) 590  
F Supp 1054.

Vehicle is subject to forfeiture when used in  
attempting to export articles in violation of law;  
attempt requires intent to engage in criminal con-  
duct and performance of one or more overt steps  
constituting substantial step towards commission of  
substantive offense; placing of unlicensed machines  
in suitcases and packing them in car for trip to  
airport with knowledge that license was required to

export machines is sufficient to establish unlawful  
state of mind; placing machines in car, transporting  
them to airport, and checking in for flight to foreign  
country are overt acts constituting substantial step  
towards commission of substantive offense; vehicle  
is used in accomplishment of illegal exportation if  
those in control of vehicle are members of conspir-  
acy or knowingly permit their vehicles to be used in  
export of contraband. United States v One 1980  
Mercedes Benz 500 SE (1985, CA9 Cal) 772 F2d  
602.

### § 422. Retention for United States of defense articles procured for foreign governments

#### RESEARCH GUIDE

Am Jur:

70A Am Jur 2d, Social Security and Medicare § 325.

#### NEUTRALITY

### § 441. Proclamation of state of war between foreign states

#### RESEARCH GUIDE

Federal Procedure L Ed:

17 Fed Proc, L Ed §§ 42:1075, 1076.

Am Jur:

3A Am Jur 2d, Aliens and Citizens § 1784.

### § 450. Restrictions on use of American ports

#### RESEARCH GUIDE

Am Jur:

3A Am Jur 2d, Aliens and Citizens § 1784.

## PREVENTION OF OFFENSES AGAINST NEUTRALITY

### § 461. Enforcement by courts; employment of land or naval forces

#### RESEARCH GUIDE

Federal Procedure L Ed:

Foreign Relations, Fed Proc L Ed §§ 36:467, 468, 471.

17 Fed Proc, L Ed §§ 42:1075, 1076.

Forms:

10 Federal Procedural Forms L Ed, Foreign Relations § 32:1.

## CHAPTER 11. FOREIGN AGENTS AND PROPAGANDA

### REGISTRATION OF FOREIGN PROPAGANDISTS

### § 611. Definitions

#### RESEARCH GUIDE

Federal Procedure L Ed:

Evidence, Fed Proc, L Ed § 33:369.

Foreign Relations, Fed Proc L Ed §§ 36:230, 232-237.

Am Jur:

3A Am Jur 2d, Aliens and Citizens §§ 563, 1034, 2107.

Forms:

10 Federal Procedural Forms L Ed, Foreign Relations §§ 32:31, 32, 36, 49.

#### INTERPRETIVE NOTES AND DECISIONS

"Political propaganda" as used in Foreign Agents  
Registration Act to identify those expressive mate-  
rials that must comply with Act's registration,  
filing, and disclosure requirements places no burden

illegal transport of arms to  
or defeat forfeiture of arms;  
arrier exception to forfeiture  
194 may not be invoked to  
forfeiture where operator of  
egal act. United States v One  
985, CA5 Tex) 750 F2d 1280.  
ct immediately upon commis-  
and forfeiture proceeding is  
overnment's title; unsecured  
raft parts for which no experi-  
s barred by criminal convic-  
and creditor cannot require  
is case second time; fact that  
innocent party unaware of any  
not affirmative defense; pre-  
aring is not required since  
d be defeated during process;  
giving notice of seizure and  
reprise unsecured creditor of

33:1.

## 22 USCS § 611

## FOREIGN AFFAIRS

on protected expression and does not violate First Amendment of U.S. Constitution, since (1) FARA does not prohibit, edit, or restrain distribution of materials subject to its provisions, but merely requires disseminators to make disclosures that better enable public to evaluate import of materials, (2) no evidence that public's perceptions regarding "propaganda" have had any adverse impact on distribution of those materials, and (3) although many people may assume that "propaganda" is misleading advocacy, Congress' use of term "propaganda" has no pejorative connotation. *Meese v Keene* (1987, US) 95 L Ed 2d 415, 107 S Ct 1862.

Attorney who was also state senator bringing suit to enjoin Department of Justice from classifying certain Canadian motion picture films as "political propaganda" pursuant to Foreign Agents Registration Act has standing to challenge alleged infringement of First Amendment regarding application of propaganda label as identifying those materials which must comply with registration, filing, and disclosure requirements of FARA where attorney alleges that if he were to exhibit films labeled as propaganda, his personal, political, and professional reputation would suffer. *Meese v Keene* (1987, US) 95 L Ed 2d 415, 107 S Ct 1862.

Fact that American fund raising organization for Irish Republican Army, was compelled to register as agent for IRA under Foreign Agents Registration Act (22 USCS §§ 611 et seq.), because organization acted at IRA request, was not sufficient to establish on summary judgment that fund raising organization was intermediary between IRA and ethnic newspaper, within standard set forth under § 611 which would require ethnic newspaper to also register as resident agent of IRA. *Atty. Gen. of United States v Irish People, Inc.* (1986, App DC) 796 F2d 520.

Circumstantial evidence that ethnic newspaper received substantial financial support from registered agent of Irish Republican Army, that newspaper had convergence of editorial viewpoints with resident agent, and that some personnel of newspaper were also members of resident agent's operation, was insufficient to sustain summary judgment that newspaper was acting on order or upon request of resident agent, and must register as agent for I.R.A. since issue of material fact shown by affidavits indicating that despite financial support and convergence of similar viewpoints, newspaper acted independently, notwithstanding that affidavits were conclusory. *Atty. Gen. of United States v Irish People, Inc.* (1986, App DC) 796 F2d 520.

Sustained rejection of ethnic newspaper's selective prosecution defense in action compelling registration of newspaper as agent of Irish Republican Army within meaning of Foreign Agents Registration Act since newspaper failed to carry burden of

proof where enforcement of statutory purposes of FARA, does not infringe upon exercise of constitutional rights, documents indicate government was motivated to carry out purposes of FARA by identifying agents of I.R.A. and ensuring that people of U. S. may appraise statements by such agents in light of their source, notwithstanding possible inferences that government also sought to stem fund raising activities for I.R.A. shown by explicit concern over terrorist activities, and fund raising by IRA agents. *Atty. Gen. of United States v Irish People, Inc.* (1986, App DC) 796 F2d 520.

Classification of film as "political propaganda" does not by itself show injury in fact for purposes of standing. *Block v Smith* (1984, DC Dist Col) 583 F Supp 1288.

Propaganda is defined as communication by which person disseminating piece intends to indoctrinate, convert, induce, or in some way influence any section of public within the United States with reference to political interests of foreign government. *Block v Smith* (1984, DC Dist Col) 583 F Supp 1288.

"Agent" of foreign government required to register is one who acts at order, request, or under direction or control of foreign principal, and must engage in alleged political activity for or in interest of foreign principal; in order to meet first requirement approving that defendant is agent, relationship between parties must be shown; it is not necessary to show that principal both directs and controls agent, since requirements of statute are stated in disjunctive; there is no distinction between paid and unpaid agents, and use of volunteers does not argue against finding of agency status; mere coincidence of editorial views of newspaper are not sufficient to satisfy requirements of act but may shed light on question whether alleged agent acts on behalf of principal. *Atty. Gen. of United States v Irish People, Inc.* (1984, DC Dist Col) 595 F Supp 114.

Attorney and state legislator who wishes to show films determined to be "political propaganda" has standing to contest government's characterization of films. *Keene v Meese* (1985, ED Cal) 619 F Supp 1111.

Materials subject to Foreign Agents Registration Act (22 USCS §§ 611 et seq.) are protected by First Amendment; term "political propaganda" has purpose and effect of constricting freedom of speech by making material to which term is applied unavailable and is therefore unconstitutional; there is no compelling governmental interest justifying requirement that film contain statement that it is political propaganda as applied to films concerning environmental and nuclear issues. *Keene v Meese* (1985, ED Cal) 619 F Supp 1111.

## § 612. Registration statement

## RESEARCH GUIDE

Federal Procedure L Ed:

Foreign Relations, Fed Proc L Ed §§ 36:230, 232.

Am Jur:

3A Am Jur 2d, Aliens and Citizens §§ 563, 2107.

Forms:

10 Federal Procedural Forms L Ed, Foreign Relations §§ 32:34, 36.

## FOREIGN AFFAIRS

ancement of statutory purposes of  
nfringe upon exercise of constitu-  
ments indicate government was  
ry out purposes of FARA by  
of I.R.A. and ensuring that peo-  
praise statements by such agents  
source, notwithstanding possible  
ernment also sought to stem fund  
or I.R.A. shown by explicit con-  
activities, and fund raising by  
Gen. of United States v Irish  
App DC) 796 F2d 520.

film as "political propaganda"  
show injury in fact for purposes  
v Smith (1984, DC Dist Col) 583

defined as communication by  
minating piece intends to indoc-  
duce, or in some way influence  
lic within the United States with  
cal interests of foreign govern-  
ment (1984, DC Dist Col) 583 F

gn government required to regis-  
ters at order, request, or under  
of foreign principal, and must  
political activity for or in interest  
it; in order to meet first require-  
ment defendant is agent, relation-  
ship must be shown; it is not  
that principal both directs and  
controls agent, since requirements of statute are  
c; there is no distinction between  
agents, and use of volunteers does  
finding of agency status; mere  
editorial views of newspaper are not  
y requirements of act but may  
show whether alleged agent acts  
pal. Atty. Gen. of United States  
(1984, DC Dist Col) 595 F Supp

ate legislator who wishes to show  
o be "political propaganda" has  
it government's characterization  
Meese (1985, ED Cal) 619 F Supp

t to Foreign Agents Registration  
Act (11 et seq.) are protected by First  
Amendment. "political propaganda" has pur-  
pose of restricting freedom of speech by  
which term is applied unavail-  
able unconstitutional; there is no  
governmental interest justifying require-  
ment statement that it is political  
propaganda. Block v Meese (1986, App DC)  
793 F2d 1303, 13 Media L R 1209.

Political propaganda classification of 3 Canadian  
films dealing with nuclear war and environmental  
issues, was proper since classification did not exceed  
identification and amount to constitutionally pro-  
hibited governmental pronouncement that films

## FOREIGN AGENTS & PROPAGANDA

### INTERPRETIVE NOTES AND DECISIONS

#### 1. Generally

General purpose of Foreign Agents Registration  
Act is to protect security and foreign relations of  
the United States by requiring agents of foreign  
principals to identify themselves and disclose activ-  
ities. Atty. Gen. of United States v Irish Northern  
Aid Committee (1981, SD NY) 530 F Supp 241.

Application of registration requirement to news-  
paper which is agent of foreign entity is not uncon-  
stitutional; to extent that there is proof that news-  
paper acts at direction of foreign entity, then First  
Amendment is satisfied because there is compelling  
government interest in conduct of foreign affairs.  
Atty. Gen. of United States v Irish People, Inc.  
(1984, DC Dist Col) 595 F Supp 114.

#### 2. Persons required to register

Registration requirement is triggered by any  
agency relationship with foreign principal which  
exists in fact, notwithstanding absence of formal  
written or oral contract. United States v German-  
American Vocational League, Inc. (1946, CA3 NJ)  
153 F2d 860, cert den 328 US 833, 90 L Ed 1608,  
66 S Ct 976.

Before requiring organization to register as agent  
of specific foreign principal, Attorney General must  
establish existence of agency relationship; agency  
relationship is shown by correspondence between  
organization and foreign principal concerning sup-  
port, solicitation of funds in United States, and like.  
Atty. Gen. of United States v Irish Northern Aid  
Committee (1981, SD NY) 530 F Supp 241, 10 Fed  
Rules Evid Serv 366, affd (CA2 NY) 668 F2d 159.

#### § 613. Exemptions

#### RESEARCH GUIDE

Federal Procedure L Ed:

Foreign Relations, Fed Proc L Ed §§ 36:230-235.

Am Jur:

3A Am Jur 2d, Aliens and Citizens §§ 563, 2107.

Forms:

10 Federal Procedural Forms L Ed, Foreign Relations §§ 32:31, 36, 49.

#### § 614. Filing and labeling of political propaganda

#### RESEARCH GUIDE

Federal Procedure L Ed:

Foreign Relations, Fed Proc L Ed § 36:230.

Am Jur:

3A Am Jur 2d, Aliens and Citizens § 2107.

Forms:

10 Federal Procedural Forms L Ed, Foreign Relations §§ 32:31, 36.

### INTERPRETIVE NOTES AND DECISIONS

Political propaganda classification of 3 Canadian  
films distributed by registered foreign agent of Can-  
ada, and concerning nuclear war and environmental  
issues, was proper since classification as political  
propaganda is not limited to films which are subver-  
sive or disseminated in political interests of foreign  
principal where language of § 614 does not indicate  
such limitations. Block v Meese (1986, App DC)  
793 F2d 1303, 13 Media L R 1209.

Political propaganda classification of 3 Canadian  
films dealing with nuclear war and environmental  
issues, was proper since classification did not exceed  
identification and amount to constitutionally pro-  
hibited governmental pronouncement that films

"Agent" of foreign government required to regis-  
ter is one who acts at order, request, or under  
direction or control of foreign principal, and must  
engage in alleged political activity for or in interest  
of foreign principal; in order to meet first require-  
ment approving that defendant is agent, relation-  
ship between parties must be shown; it is not  
necessary to show that principal both directs and  
controls agent, since requirements of statute are  
stated in disjunctive; there is no distinction between  
paid and unpaid agents, and use of volunteers does  
not argue against finding of agency status; mere  
coincidence of editorial views of newspaper are not  
sufficient to satisfy requirements of act but may  
shed light on question whether alleged agent acts  
on behalf of principal. Atty. Gen. of United States  
v Irish People, Inc. (1984, DC Dist Col) 595 F Supp  
114.

#### Annotation:

Requirement that agent of foreign principal reg-  
ister with United States Attorney General under  
provisions of Foreign Agents Registration Act of  
1938, as amended (22 USCS §§ 611 et seq.), 67  
ALR Fed 774 (see especially § 5, concerning per-  
sons required to register).

#### 3. Permissible inquiries

Requirement that agent of foreign principal reg-  
ister with United States Attorney General, under  
provisions of Foreign Agents Registration Act of  
1938, as amended (22 USCS §§ 611 et seq.), 67  
ALR Fed 774 (see especially § 5 [c], concerning  
contents of registration statement).

contain half truths and are attempts to mislead, in  
violation of First Amendment where government  
does not express its own disapproval by propaganda  
labeling but merely identifies objective category of  
speech which public generally disapproves; even if  
propaganda classification did constitute expression  
of official government disapproval, reason and pre-  
cedent do not justify finding that such expression in  
itself is unlawful. Block v Meese (1986, App DC)  
793 F2d 1303, 13 Media L R 1209.

U. S. film distributor with exclusive right to  
distribute Canadian film on nuclear war being dis-  
seminated by registered Canadian foreign agent had  
standing to contest Department of Justice's classifi-

161A-HQ-1042752  
GLC:

U.S. ATTORNEY'S OFFICE  
555 4th Street N.W.  
Washington, D.C.

On 12/31/91, Investigative Assistant (IA) [ ] submitted a request to the NARCOTICS, PUBLIC CORRUPTION, ECONOMIC CRIME, TRANSNATIONAL/MAJOR CRIMES UNIT of the U. S. Attorney's Office, for a search to be conducted regarding the appointee.

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On 12/31/91, IA [ ] was contacted by [ ] Liaison of the Pending and Closed Cases Section of the Special Prosecution, Trial and Grand Jury Divisions of the above captioned agency. [ ] advised that no identifiable records could be located regarding the appointee.

On 1/4/93, SUPERVISORY SPECIAL AGENT [ ] was contacted by [ ] Liaison of the Pending and Closed Cases of the Civil Division. [ ] advised that their records reflect the following file which may be identifiable with the appointee: Case Number [ ] with plaintiff [ ] [ ] Accension Number [ ] Location Number [ ] [ ] advised that this file is located at the Federal Records Center and she would try to locate the record and make it available for review.

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It should be noted that the index system of the Civil Division, U.S. Attorney's Office, contains only names of plaintiffs, except in Civil Actions brought by the United States against a particular defendant. Suits against government employees who are represented by the United States Attorney would be filed by plaintiff's name and docket number.



161A-HQ-1042752  
TCR:glc

WASHINGTON NATIONAL RECORDS CENTER (WNRC)  
Washington, D.C. 20409

On 1/4/93 [REDACTED] WNRC, provided documents  
pertaining to Case Number 86-2910 via facsimile to  
Supervisory Special Agent [REDACTED] Copies of  
those documents are attached hereto.

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A review of the case disclosed that the appointee,  
RONALD HARMON BROWN, was named as one of several defendants in  
his capacity as a Trustee for the University of the District of  
Columbia, in a civil suit filed by [REDACTED]  
plaintiff, who claimed the he had been erroneously fired from UDC  
and that his civil rights had been violated. The case was  
dismissed on 3/5/91.

WMFO 161A-HQ-1042752

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FILE REVIEW

District of Columbia Contracts Appeals Board

The following investigation was conducted by Special Agent (SA) [REDACTED] on December 31, 1992, regarding the appointee, RONALD HARMON BROWN:

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On December 31, 1992, a review was conducted at the District of Columbia Contracts Appeals Board of the file numbered P312, pertaining to Capital PEBSCO and COPELAND ASSOCIATES, INCORPORATED (COPELAND). This review showed that COPELAND filed a protest with the Contracts Review Board on February 10, 1992, regarding the awarding of a contract to Capital PEBSCO for the administering of the District's Public Employees Deferred Compensation Plan.

The protest was based on two grounds: 1) that the decision did not reflect a reasoned consideration of the evaluation criteria, and; 2) that the Contracts Board did not consider the prejudice to the District employees who have been served by COPELAND for six years and now face a disrupting change of service. The Contracts Review Board refused to consider the second ground for the protest, in that it was not alleged in a timely manner. The review of the file revealed that the Contracts Review Board appeared to give full consideration to the first allegation.

Initial calculations of the scoring by the Awarding Board showed COPELAND to be the low bidder with Capital PEBSCO scoring higher in the areas of Capital Technical and Capital Criteria and Oral Presentation. As part of its protest, COPELAND challenged the scoring of one of the five members on the Awarding Board. [REDACTED] COPELAND alleged that the scores given by [REDACTED] did not accurately reflect the qualifications of the bidders. The scores given by [REDACTED] appeared to be the most skewed in favor of Capital PEBSCO. [REDACTED] provided an affidavit to the Contracts Review Board giving her reasons for scoring Capital PEBSCO higher in the areas of Technical, Criteria, and Oral Presentation.

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The opinion of the Contracts Review Board stated that it found no merit to the protests, and that the contract had been properly awarded. The opinion cited additional factors that the Awarding Board is permitted to consider other than price. The opinion also noted that in reviewing the price of the bid of the two companies, the bid of Capital PEBSCO was actually the low bid

WMFO 161A-HQ-1042752

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when comparable maximum fees are taken into consideration in the calculation. The Contracts Review Board appeared to give careful consideration to all of the factors to be considered in the awarding process, and the opinion was replete with attachments of calculations.

Pertinent portions of the file were tabbed for photocopying and the Clerk of the Contracts Review Board said the photocopying would be completed on Monday, January 4, 1993.

WMFO 161A-HQ-1042752  
DEV:glc

MISCELLANEOUS

On 1/4/93, Special Agent [redacted] received from [redacted] Clerk, Contract Appeals Board, Government of the District of Columbia, photocopies (attached hereto) of records previously tabbed pertaining to Case Number P-312. This case involved an appeal by Copeland Associates, Incorporated, regarding a contract awarded to Capital/PEBSCO. Photocopies consisted of the final opinion of the Board, the response of the District, the reply of protester, the final offer of Capital/PEBSCO, and the initial protest filed by Copeland.

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- 11 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/5/93

[redacted]  
[redacted] District of Columbia, telephonically contacted SA [redacted] after being requested to do so through [redacted] her administrative assistant, and [redacted] was advised that the FBI was conducting a background investigation of presidential appointee RONALD BROWN and that information was sought from her regarding BROWN and a [redacted] contract [redacted]

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[redacted] said that she would need a formal written request for information before she would consider providing information, and explained that, "In light of all of the things that have happened, we need to protect ourselves." [redacted] then asked for specifics regarding the information sought from her. It was explained to [redacted] that, since [redacted] she may have information of interest regarding the awarding of [redacted]

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[redacted] said she could not discuss the matter without pertinent documents in front of her. She added that she had no recollection of the contract.

[redacted] said that BROWN never talked to her about the contract [redacted] said that she has met with [redacted] approximately [redacted] but never discussed [redacted]

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At the conclusion of the interview, [redacted] again requested that a written request for information be provided to her office. She was advised that the appropriate FBI supervisor would be asked to send such a request. SSA [redacted] was then advised of her request.

Investigation on 1/4/93 at Washington D.C. File # 161A-HQ-1042752

by SA [redacted] Date dictated 1/5/93

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WMFO 161A-HQ-1042752  
TCR:glc

Record Check

District of Columbia  
Contract Selection Committee  
14th and Pennsylvania Avenue, Northwest  
Washington, D.C.

On 1/4/93, the following investigation was conducted by  
Special Agent [redacted] regarding the appointee, RONALD  
HARMON BROWN:

[redacted] Office of the Treasury, Room  
[redacted] District of Columbia Municipal Building, 14th and  
Pennsylvania Avenue, Northwest, Washington, D.C., provided by  
facsimile documents pertaining to the recommendations of the  
District of Columbia Selection Committee for the Interim Bond  
Counsel contract. Copies of those documents are attached hereto.

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[redacted] advised that a review of the documents reflected  
that the District of Columbia Selection Committee recommended five  
majority and five minority law firms as finalists for Interim Bond  
Counsel for the D.C. Government. [redacted] further advised that these  
10 finalists were taken to Mayor SHARON PRATT KELLY and that the  
Mayor selected two of the 10 finalists for the Interim Bond  
contract. [redacted] advised that the Selection Committee  
recommendations were forwarded to the Mayor's Office on 6/17/91.  
[redacted] further advised that the contract award which was signed by  
Mayor KELLY would whether be retained in the Mayor's office files  
or in Deputy Mayor O'CONNOR's files. [redacted] provided no additional  
information.

**DRAFT****OVERVIEW OF RECOMMENDATION REPORT**

- o Invitations to submit proposal for Bond Counsel and Financial Advisors were mailed on May 31, 1991, to 54 financial consulting firms and 83 law firms.
- o Display ads were published in the Bond Buyer, the Washington Post and the New York Times on June 3, 1991 resulting in an additional 23 financial consulting firms and 15 law firms requesting RFPs.
- o A pre-proposal conference was held on June 5, 1991 with an estimated attendance of 40 to 50 individuals. Representatives from the Office of the Deputy Mayor for Finance, the Office of the D.C. Treasurer and the Office of the Corporation Counsel were present to answer questions of the prospective bidders.
- o Generally all proposals were received in the Office of the Deputy Mayor for Finance no later than 5:00 p.m., Monday, June 10, 1991.
- o Proposals were reviewed and discussed June 11-14 by the Committee. The Selection Committee consisted of:

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- o The Selection Committee recommendation was forwarded to the Mayor June 17, 1991.

DRAFT

**RECOMMENDATION**

The District of Columbia on May 31, 1991 mailed out invitations to submit proposals for bond counsel and financial advisor for the District of Columbia. Invitations were delivered to all District of Columbia law firms and nationally ranked financial advisors listed in the Directory of Municipal Bond Dealers of the United States (Red Book).

Members of local organizations and bar associations such as the National Bar Association and the Hispanic Bar Association were also contacted. A total of 77 financial consulting firms and 98 law firms received proposals.

In accordance with the terms of the invitations, proposals were generally received by 5:00 p.m. on June 10, 1991. A total of thirteen (13) proposals were received for financial advisor and twenty-seven (27) proposals for bond counsel (see attachment A).

The Committee members independently reviewed and ranked the submitted proposals. Collectively, the Committee identified the top firms based on the evaluation criteria stated in the RFP. There was substantial concurrence in the ranking. In those instances where members disagreed, there was discussion and mutual agreement.

Accordingly, the Selection Committee's recommended finalists and their proposed flat fees are as follows:

**BOND COUNSEL****MAJORITY:**

- 1.
- 2.
- 3.
- 4.
- 5.

--

**MINORITY:**

- 1.
- 2.
- 3.
- 4.
- 5.

--

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**DRAFT****FINANCIAL ADVISOR****MAJORITY:**

1. [REDACTED] - \$75,000
2. [REDACTED] - \$450,000
3. [REDACTED] - \$150,000

**MINORITY:**

1. [REDACTED] - \$375,000
2. [REDACTED] \$50,000 \*
3. [REDACTED] - \$300,000 \*

\* Firms are seeking a minimum fee in the event an issue does not close. The District's current practice is to reimburse only for out of pocket expenses. [REDACTED] - \$20K, [REDACTED]

[REDACTED] - \$225k

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THE CENTER FOR PUBLIC INTEGRITY

September 28, 1992

Mr. Ronald H. Brown  
Chairman  
Democratic National Committee  
430 South Capitol Street, SE  
Washington, D.C. 20003

Dear Mr. Brown:

Enclosed is our ninth study, entitled, "PRIVATE PARTIES: Political Party Leadership in Washington's Mercenary Culture."

Sincerely,

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b7C*Copy  
Letter**Statement**pp. 1-2**pp. 15-16-17**pp. 19**pp. 38-52*

FD-302 (Rev. 3-10-82)

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/4/93

[redacted] law firm of PATTON, BOGGS AND BLOW, 2550 M Street Northwest, Washington, D.C., was interviewed at his residence, [redacted] was advised of the identities of the interviewing Agents and was further advised that the interview concerned the background investigation of RONALD HARMON BROWN (hereafter referred to as appointee) [redacted] furnished the following information:

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Appointee joined the law firm of PATTON, BOGGS AND BLOW in 1981, and became an equity partner approximately two and one half years later. According to [redacted] an equity partner has a fixed percentage of the firm to equal the percentage of expenses the partner must bear, which fluctuates yearly. As an equity partner in 1992, the appointee's percentage of the law firm and the percentage of his expenses were approximately two and three quarter percent. Approximately one or two weeks prior to [redacted] suggested to the appointee that the appointee resign from the firm effective December 31, 1992. By resigning on this date, the appointee would not have accounts receivable for law firm related business conducted in 1993. According to [redacted] the appointee seemed amenable to the proposed December 31 resignation date.

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[redacted] explained that partners of the firm are highly paid for originating business and if a client remains with the firm, the attorney continues receiving credit for the client's business. According to [redacted] theoretically, there is no limit on the amount of business that an attorney may bring to the firm. The appointee was credited for over one million dollars worth of business brought to the firm, regardless of the amount of hours of substantive work performed for the client.

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According to [redacted] there is a public perception problem regarding the continuation of remuneration after a partner severs his relationship with the firm. It is a function of the partnership that the attorney is entitled to the percentage of

Investigation on 1/3/93 at [redacted] File # 161A-HQ-1042752 - 110  
by SA [redacted] AEC:kjh Date dictated 1/3/93

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FD-302a (Rev. 11-15-83)

161A-HQ-1042752

Continuation of FD-302 of [REDACTED], On 1/3/93, Page 2

accounts receivable from previously uncollected fees. If, during 1993, one of the appointee's former clients pays a past due account from a previous year, the appointee would be entitled to his share of the funds collected from that client. [REDACTED]

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[REDACTED]

According to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] advised it is his belief that, since 1989, the appointee has put in a full 40 hour week at the DEMOCRATIC NATIONAL COMMITTEE (DNC). [REDACTED]

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[REDACTED] stated he had no knowledge of any lobbying by the appointee from 1989 to the present. [REDACTED] stated he did not recall the appointee as a lobbyist. According to [REDACTED] the law firm may have lobbied on behalf of the appointee's clients but [REDACTED] has no specific recollection of the appointee's lobbying efforts. [REDACTED] advised he has seen little of the appointee around the office in the last four years and believes the appointee has devoted most of his time to the DNC.

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[REDACTED] stated the appointee was instrumental in getting the law firm involved in bond contracts. According to [REDACTED] there were a number of law firms picked by the District of Columbia and, although the appointee signed the detailed proposal as head of the firm's Bond Department, most of the substantive work was performed by partners [REDACTED] and some associate attorneys.

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According to [REDACTED] the appointee was helpful in securing the contract because he is a well known Black who identified with

FD-302a (Rev. 11-15-83)

161A-HQ-1042752

Continuation of FD-302 of [REDACTED]

, On 1/3/93 , Page 3

Black politicians in the District of Columbia. Although the law firm was not classified as a minority firm, the Black politicians in the District of Columbia either knew or knew of the appointee. [REDACTED] knew of no member of the law firm other than the appointee who was familiar with individuals in the District of Columbia government. According to [REDACTED] the appointee and Mayor KELLY seem to be very good friends, as both served as Deputy Chairmen of the DNC. According to [REDACTED] the appointee knew most of the prominent Black politicians in the District of Columbia, but [REDACTED] had no knowledge of any lobbying efforts by the appointee with regard to KELLY or any of her associates in the D.C. government.

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[REDACTED] advised [REDACTED] [REDACTED] The firm did about [REDACTED] worth of work, but their fee was capped at [REDACTED] [REDACTED] stated it is his belief that the firm has not gotten the better work from the District and the work that was received was far more complicated than previously described. In addition, the firm was criticized publicly by [REDACTED] a member of the Mayor's Office, for inadequate performance. [REDACTED] insisted that [REDACTED] criticism was unwarranted.

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[REDACTED] advised he believes the appointee was put on the Board of Directors at CHEMFIX because he is Black and a prominent politician. The law firm had been doing work for [REDACTED] (first name not recalled by [REDACTED] CHEMFIX and a subsidiary for over ten years. [REDACTED]

[REDACTED] stated the appointee's financial interest in CHEMFIX is so minimal it would not make sense to believe that the appointee would choose New York City as the site of the DEMOCRATIC NATIONAL CONVENTION in order to assist CHEMFIX's bid for the New York City contract. According to [REDACTED] the appointee did not have any ownership of CHEMFIX as a client, as the company was originally a client of [REDACTED] [REDACTED] stated he did not know whether the firm was involved in the negotiations of the New York City CHEMFIX contract, but advised that the firm might have been involved since CHEMFIX was a client at that time. [REDACTED] stated there is also a possibility that the firm became involved during the execution of the contract, if not directly involved in the contract negotiations.

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Continuation of FD-302 of [REDACTED]

On 1/3/93, Page 4

[REDACTED] advised he would be able to furnish names of those attorneys who might have worked with CHEMFIX.

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[REDACTED] stated he was unaware of any efforts by the appointee to lobby Mayor DINKINS on behalf of CHEMFIX. [REDACTED] stated he had no conversations with the appointee at the time of the contract and felt certain he spoke to the appointee regarding the allegations when they appeared in the press. At that time, the appointee responded by referring to the allegations as utterly ridiculous. According to [REDACTED] the allegations appear ludicrous in that the appointee did not have a significant financial interest in CHEMFIX and his stock was insignificant.

[REDACTED] described the appointee as a very gifted individual who has the ability to deal with people and earn their loyalty. The appointee is never confrontational and never complains. The appointee is very popular among other attorneys and has participated in some of the firm's social events. [REDACTED] observed no indication of alcohol abuse, abuse of prescription drugs or use of illegal drugs by the appointee and advised he has never seen the appointee drink alcoholic beverages. [REDACTED] did not doubt the appointee's loyalty to the United States Government and felt certain that the appointee harbors no racial, ethnic, religious or gender bias. [REDACTED] is acquainted with [REDACTED]

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[REDACTED] described the appointee as a financially stable individual who makes a substantial income from the firm and lives within his means. According to [REDACTED] the appointee will take a considerable cut in salary as a Government employee, but his children have already been educated, thus relieving him of that financial burden.

According to [REDACTED] the appointee has a lot of personal friends, and those who are known by [REDACTED] are described as reputable individuals. According to [REDACTED] those with whom he is not acquainted have attended [REDACTED] and appear to be professional people. [REDACTED] lauded the appointee's organizational skills and advised that the success of the DEMOCRATIC NATIONAL CONVENTION is a testament to the appointee's abilities.

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[REDACTED] stated the firm requires its partners to disclose any business dealings that relate to clients of the firm to ensure that there is no conflict between "lawyering" and personal

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ensure that there is no conflict between "lawyering" and personal financial interest in the client. According to [REDACTED] appointee has demonstrated the highest ethical behavior and has displayed no improper conduct within the context of the law firm.

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[REDACTED] highly recommended the appointee for a Presidential appointment.

# PRESIDENTIAL EXPEDITE

December 23, 1992

FROM: Director, FBI (161A - HQ - 1042752)

TO: SACs, Albany (Enc.)  
 Boston  
 Los Angeles  
 New York (Enc.)  
 Pittsburgh (Enc.)  
 St. Louis (Enc.)  
 WMFO (Enc.)

(Rec. at WMFO)  
 7:00 PM  
 12/23/92

RONALD HARMON BROWN, AKA  
 RON BROWN  
 SPIN;  
 OO: FBIHQ  
 BUDED: 1/4/93

ReButelcalls to above offices on 12/23/92.

Enclosed for New York and WMFO is a copy of Brown's SF-86 (including release of information form) dated 12/19/92. Enclosed for Albany, Pittsburgh, and St. Louis is a copy of release of information form only dated 12/19/92. There are no enclosures for Boston or Los Angeles.

Bureau has been requested by the Office of the President Elect (OSE) to conduct an EXPEDITE Level I background investigation (BI) of appointee. Appointee was born 8/1/41 at Washington, D.C., resides at 2722 Unicorn Lane, Northwest, Washington, D.C., and has SSAN 095-32-5852.

Field Offices are reminded that the investigative status of a BI, all deadlines and the position for which the appointee is being considered shall not be disclosed to any interviewee. If during the course of the investigation, interviewees provide the nature of the position, that information is not to be further divulged outside the FBI. Inquiries by interviewees concerning the nature of the position are to be handled as set forth in MIOG Part II, Section 17-5 (5). Appointees making inquiries regarding the status of their BI are to be referred to the client agency.

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Direct results/questions to PSS [redacted] SPIN Unit FBIHQ, Room 4371, Ext. 2538. If BUDED will not be met, telephonically advise PSS [redacted] and set forth reason(s) in Administrative section of investigative report. SPIN Unit facsimile numbers are: (202) 324-2574 and (202) 324-1373.

Advise FBIHQ (PSS) [redacted] and appropriate field offices of any derogatory information [redacted] with MIOG, Part II, Section 17-5.1(1).

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SEARCHED	INDEXED
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DEC 24 1992	
FBI WASH FIELD OFFICE	

25 12/28/92 12/24/92 22N

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